

Section 32 Report

Ngā tohu/ Signs Chapter

prepared for the

Proposed Waimakariri District Plan

18 September 2021



WAIMAKARIRI
DISTRICT COUNCIL

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1. EXECUTIVE SUMMARY

The Signs Chapter manages the effects of signs. The key resource management issue associated with signs is that while they assist in providing for the District's economic and community well-being by promoting commercial and temporary activities, and directing, warning and informing the public, they can adversely affect transport safety, character, amenity values, landscape values, natural values, and heritage values.

The Operative District Plan does not adequately address these issues because:

- it does not contain specific rules for certain signs that may be appropriate (such as signs at temporary activities), or certain signs that may need additional controls (such as signs within areas with outstanding landscape values), thus these signs would be required to meet on-site sign requirements which does not recognise their specific characteristics;
- there are no specific objectives, policies or matters of discretion for signs to guide decision making;
- the rules require resource consent for all types of digital signs and all off-site signs thus do not recognise that these types of signs may be appropriate in some instances;
- it does not limit the total number of temporary signs promoting events and/or local government elections per site; and
- the limits on sign display areas and height do not reflect the function, context, character, and amenity values of the proposed zones in the Proposed Plan.

To address these issues, the following changes are proposed:

- provision for community signs, temporary signs at temporary activities, off-site directional signs, and small scale digital signs;
- objective, policies, and matters of discretion specific to signs;
- controls for signs in more sensitive environments to manage natural, landscape and heritage values, and subdivision development entrance signs; and
- limits on sign display area, height and the number of signs per site that reflects the zones in the Proposed District Plan.

The proposed provisions aim to both enable and control signs in order to support economic and community wellbeing, while maintaining transport safety, the character and amenity values of zones, and any natural, landscape or heritage values of sensitive areas.

2. OVERVIEW AND PURPOSE

2.1 Purpose of Section 32 RMA

The overarching purpose of Section 32 of the Resource Management Act 1991 (RMA) is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions.

Section 32 reports are intended to clearly and transparently communicate the reasoning behind plan provisions to the public. The report should provide a record of the evaluation process, including the consultation, technical work, methods, assumptions and risks that informed that process. A robust report can prove highly useful to decision makers, particularly where it clearly communicates the analysis undertaken to identify the most appropriate way to achieve the purpose of the RMA.

The District Council is required to undertake an evaluation of any proposed District Plan provisions before notifying those provisions. The Section 32 evaluation report provides the reasoning and rationale for the proposed provisions and should be read in conjunction with those provisions.

2.2 Topic Description

The purpose of the Signs chapter is to make provision for business, infrastructure and community signs to advertise, identify, inform and warn, while managing the potential adverse effects on transport safety, character, and amenity, natural, landscape or heritage values.

This chapter does not specifically deal with traffic related signage, which is controlled by the Land Transport Act 1998, however such traffic related signs would be considered an 'official sign' within the rules.

2.3 Significance of this Topic

The chapter recognises that signs provide a range of important functions to the District. The Chapter also recognises that in some instances, signs need careful management to ensure they do not create adverse effects on transport safety, character and amenity values. Management of signs is significant in that it helps to maintain the anticipated amenity values of zones, along with any natural, landscape and heritage values of certain overlays, and transport safety for the transport network.

2.4 Current Objectives, Policies and Methods

The Operative District Plan contains one objective and policy relating to signs. Objective 12.1.1 relates to a range of activities including signs and aims to maintain amenity values and an appropriate quality of environment from their adverse effects. Policy 12.1.1.7 specifically relates to the management of the effects of signs on traffic safety and amenity values.

The method framework is mainly effects-based and includes rules relating to sign area, height, design, function, the number of signs per site, location of signs with respect to roads, and standards and exemptions for temporary signs (note there is no limit on the maximum number of temporary signs for events or local government elections per site). The Signage Bylaw 2019 also forms part of the method framework for managing signs, refer to Section 3.5.1 and 5.4 for further details.

These provisions are a result of Council Plan Change 29, which became operative in 2012. Plan Change 29 aimed to address a range of issues including off-site signs, signs protruding over rooflines in the business zones, exceedance of the number of signs located along a road frontage, and signs breaching

area and height limits. The Signage Bylaw 2012 was also developed during this time (this was later reviewed in 2019).

2.5 Information and Analysis

Table 1: List of relevant background assessments and reports

| Title | Author |
|--|--|
| District Plan Effectiveness Review - Quality of the environment reports | <i>Waimakariri District Council, July – September 2016</i> |
| Description of Report | |
| <p>These reports outline the effectiveness of the Operative District Plan for the respective zone or clusters of zones, relating to provisions that manage the quality of the environment. These provisions include activities such as signs, along with noise, glare, hazardous substances and odour. It was primarily informed by internal stakeholder feedback. The key findings relating to signs were:</p> <ul style="list-style-type: none"> • The primary issues are transport safety and amenity values. • Signs painted directly onto buildings require regulation. • Where signs are placed near boundaries, it can be difficult to determine whether the Signage Bylaw or the District Plan applies, which affects compliance and enforcement. The relationship between the Signage Bylaw and District Plan needs to be clear and easy to apply. • Mobile signage on trailers or vehicles is an issue. • Real estate signs are often placed near intersections which can cause compromised safety by distracting road traffic. • Glare from signs can be an issue. • Removal of temporary signs relating to outdated events can be an issue. | |
| Title | Author |
| Traffic control devices manual, Part 3 - Advertising signs | <i>NZ Transport Authority, January 2011</i> |
| Description of Report | |
| <p>The manual provides guidance on best practice for the use of advertising signs and considers matters relating to both transport safety and urban design.</p> <p>Key messages:</p> <ul style="list-style-type: none"> • The primary issue with roadside signs relate to their location in terms of the overall environment and also in the context of nearby intersections, pedestrian crossings, major road curves, traffic signs or signals, and other signs. • Recommended minimum distances of an unrestricted view of a sign, lateral separation from road reserve to avoid physical obstruction or hazard, longitudinal separation from intersections, pedestrian crossings, major road curves, traffic signs or signals to reduce potential for obstruction or distraction, minimum sign letter size relative to speed to ensure signs are readable, and limitations on sign material that can cause hazards. <p>These guidelines helped inform the transport safety standards.</p> | |
| Title | Author |
| Waimakariri District Council District Plan Review – Light (24 September 2019) | <i>WSP</i> |
| Description of Report | |
| <p>Expert advice was sought for light spill and glare, and also lighting of vertical planes such as signs or façades.</p> <p>Key messages:</p> <ul style="list-style-type: none"> • Level of effect from illuminated vertical planes and signs relates to the sensitivity of the receiving zone. | |

- Obtrusive lighting effects is confined to luminance (brightness) and glare, particularly to road users.
- Light spill from illuminated signs is inherently limited by the zone rules so no additional requirements are required.
- Intermittent, flashing or rotating signs should not be permitted.
- A rule structure per zone for illuminated and digital signs was recommended.

This advice helped inform the approach for managing illuminated signs, including digital signs.

2.6 Consultation Undertaken

Consultation has been undertaken as part of this District Plan Review process with key stakeholders. Relevant Council staff and Councillors were consulted with as part of developing and testing the direction and content of proposed provisions. This internal feedback, along with feedback from external stakeholders, helped inform the proposed provisions.

It is noted that none of the public feedback received during the District Development Strategy consultation in 2017, District Plan Review Issues and Options in 2017, and 'What's the Plan? Shaping the Content of the Reviewed District Plan' in 2019, related to signs.

Feedback from external stakeholders relevant to the Signs Chapter is summarised below.

2.6.1 Waka Kotahi NZ Transport Agency (Waka Kotahi)

1. Off-site signs are not supported;
2. The number of signs per site should be limited;
3. Signs erected by road controlling authorities, including digital ones, should be enabled and would be considered to be 'official signs';
4. Signs adjacent to State Highways should meet Waka Kotahi guidelines which includes limits on minimum lettering heights, maximum number of words and characters, avoidance of colours similar to official road or traffic signs, avoidance of reflective materials, internal or external illumination, or variable, flashing, rotating or animated parts, along with sight distance requirements relative to the speed environment, and separation requirements between official road or traffic signs and other signs;
5. Changeable digital signs in speed environments greater than 70km/hr are not supported, and in speed environments of less than 70km/hr they are supported subject to standards on matters such as cycle rates noting that from a safety perspective a cycle rate of 5 minutes to 1 hour is preferable;
6. Signs on trailers, which are typically off-site signs, are not supported. They should be treated as billboards and need to be clearly defined so as to not be confused with branding on vehicles;
7. The complexity of the environment needs to be part of the assessment matters; and
8. The cumulative number of signs permitted per site needs to be controlled.

2.6.2 A local signs company:

1. The allowance for sign area should be proportionate to the length of a site's road frontage, or the number of businesses on a site; and
2. The permitted number of freestanding signs should be greater for sites with multiple road frontages or multiple businesses.

2.6.3 Rangiora Promotions

1. The Operative District Plan's size, height and duration limits for event signs are still reasonable.

2.6.4 Enterprise North Canterbury

1. The process for assessing compliance, or applying for resource consent, is complicated. Clear guidelines are important, especially for transport safety related requirements which can be complex;
2. Entrance signs for subdivision developments should be allowed during the period that properties are selling however once the area is fully developed the signs should be removed to help the area integrate with the adjacent areas;
3. Visual clutter is an issue so allowing off-site signs would proliferate this;
4. Consideration should be given on how to help businesses that are located down quiet rural roads advertise their location and directional information off-site nearby (e.g. 'Firewood 100m next left');
5. There are a lot of freestanding signs facing State Highway 1; and
6. Large signs on trailers are visually offensive so should be tightly controlled.

2.6.5 Local real estate agents:

1. The limit of two real estate signs per road boundary per site is reasonable;
2. Most signs are 1.8m by 1.2m; and
3. Industry regulations required signs to be removed by the settlement date.

Comment: This feedback helped inform the proposed provisions.

2.7 Iwi Authority Advice

Clause 3(1)(d) of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities during the preparation of a proposed plan. Clause 4A requires the District Council to provide a copy of a draft proposed plan to iwi authorities and have particular regard to any advice received.

The iwi authority were consulted on the draft plan and the only comment they made regarding the signs provisions was clarification on how they would apply to signs for way-finding, services and public health messages within a marae. It was noted that these signs would be covered by the provisions for internalised signs, community signs or official signs which are all permitted. It is noted that all the rules in the Signs Chapter apply to all Special Purpose Zone – Kainga Nohoanga areas.

2.8 Reference to Other Relevant Evaluations

This Section 32 topic report should be read in conjunction with the following evaluations:

- (a) Light topic section 32 report – for additional controls for illuminated signs;
- (b) Temporary activities topic section 32 report – includes rules for temporary activities;
- (c) Historic heritage topic section 32 report – for heritage value considerations;
- (d) Earthworks topic section 32 report – for additional consideration of earthworks associated with the foundation of any freestanding sign within any Sites or Areas of Significance to Maori; and
- (e) Section 32 reports for zones (residential zones, rural zones and open space zones in particular), for amenity value and character expectations for the receiving environment.

3. STATUTORY AND POLICY CONTEXT

3.1 Resource Management Act 1991

Section 5 of the RMA sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources. In achieving this purpose, authorities need to recognise and provide for matters of national importance identified in Section 6, have particular regard to other matters listed in Section 7, and take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) under Section 8.

Section 6

The 'matters of national importance' that are relevant to this topic are section 6(b) and section 6(f) as controls for signs on and near outstanding natural features or landscapes and on historic heritage items or settings respectively are more restrictive in order to protect them from inappropriate use and development.

Section 7

The 'other matters' relevant to this topic are:

- Section 7(b) requires particular regard to be given to the efficient use and development of natural and physical resources. The efficient use of the transport network, a physical resource, is an important factor that signs have the potential to affect.
- Section 7(c) and 7(f) require particular regard to be given to the maintenance and enhancement of both amenity values and the quality of the environment respectively. Amenity values and the quality of the environment can be adversely affected by signs therefore the management of them is important.

The proposed provisions look to manage matters relating to both transport safety and amenity values in relation to signs.

Section 8

Section 8 of the RMA requires the council to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Tangata whenua, through iwi authorities, have been consulted as part of the review process. Their feedback relating to the proposed provisions is outlined in Section 2.7.

3.2 National Instruments

The following national instruments are relevant to this topic:

3.2.1 National Planning Standards

The National planning standards were introduced in November 2019 with the purpose of improving the consistency of council plans and policy statements. Under s75 (3) of the RMA, a District Plan must give effect to a National Planning Standard. The Proposed District Plan has been prepared in accordance with National Planning Standards 2019, which were introduced by the Resource Legislation Amendment Act 2017 to make plans and policy statements more useable, accessible and easier to prepare.

The Proposed District Plan will give effect to the National Planning Standards by including a separate district-wide chapter for managing signs. It also uses a standardised definition of 'sign' and 'official sign'.

3.2.3 National Environmental Standards

The National Environmental Standards for Electricity Transmission Activities Regulations 2009 contains some clauses relating to installing or modifying signs on transmission line support structures. Such signs would be considered 'official signs' and will be enabled by Rule SIGN-R1.

3.3 Regional policy statement and plans

3.3.1 Canterbury Regional Policy Statement 2013 (CRPS)

The Proposed District Plan must give effect to the CRPS. While there is no specific reference to signs in the CRPS, the following objectives and policies are indirectly relevant:

1. Chapter 5 (Land-use and Infrastructure)

- a. Objective 5.2.1 aims for development that is located and designed so that it maintains the quality of the natural environment, and avoids conflict between incompatible activities.
- b. Objective 5.2.3 aims for a safe, efficient and effective transport system.
- c. Policy 5.3.1 requires the provision of an efficient and effective transport network, enhancement of amenity values and encouragement high quality urban design.
- d. Policy 5.3.8 requires integrated land use and transport planning that avoids or mitigates conflicts with incompatible activities.

2. Chapter 6 (Recovery and Rebuilding Greater Christchurch)

- a. Policy 6.3.6 requires avoidance or mitigation of conflicts between incompatible activities.

3. Chapter 8 (Coastal Environment)

- a. Objective 8.2.4 and Policy 8.3.4 requires the coastal environment's natural character to be preserved and protected from inappropriate use, and its values, including natural and amenity values, restored or enhanced.

4. Chapter 12 (Landscape)

- a. Policy 12.3.2 requires management of land use activities to protect outstanding natural features and landscapes from inappropriate use.

5. Chapter 13 (Historic Heritage)

- a. Policy 13.3.1 requires the recognition and provision for the protection of historic and cultural heritage from inappropriate use.

Comment: The proposed provisions give effect to these objectives and policies by controlling signs in order to maintain transport safety, the character and amenity values of zones, and any natural, landscape or heritage values of sensitive areas.

3.3.2 Canterbury Regional Plans

The provisions of the Canterbury Air Regional Plan, Canterbury Land and Water Regional Plan, Regional Coastal Environment Plan for the Canterbury Region, Waimakariri River Regional Plan, Canterbury Regional Pest Management Plan, Canterbury Regional Land Transport Plan, Canterbury Regional Public Transport Plan, and Land Use Recovery Plan are not relevant to the Signs Chapter.

3.4 Iwi Management Plan

There are no relevant policies in the Iwi Management Plan directly relating to signs in the Waimakariri District. However, Policy WAI4.5 requires protection of wāhi tapu and wāhi taonga sites from inappropriate land use, which is indirectly relevant to signs as uncontrolled signs on these sites could potentially create cultural and amenity issues. While the proposed provisions do not have specific

controls for signs within Sites and Areas of Significance to Māori, they do control signs overall thereby limiting their discrete and cumulative effects on these sites.

3.5 Any relevant management plans and strategies

The following management plans and strategies prepared under other legislation are relevant to this matter:

3.5.1 Council Signage Bylaw 2019 (Signage Bylaw)

- a. Controls signs located on Council-owned premises and road reserve, along with signs on privately owned premises if they are considered to be adversely affecting traffic and public safety.
- b. Only signs provided for in the bylaw may be erected on Council-owned premises including parks, reserves, buildings and structures and road reserve.
- c. Provides for real estate signage, event signage, footpath signage and advertising, and signage overhanging footpaths or roads.
- d. There are also controls for vehicle and trailer signage, signs affecting traffic or public safety (which has the scope to cover private property also), the location of election signs, and signage content.
- e. The Signage Bylaw provides for digital signs however uses the defined term 'changeable message signage'.
- f. Precludes the display of signage on, or connected to a vehicle, or parked trailer that is on a road or a public place, if the principal function of the trailer or vehicle is to display advertising material.

3.5.2 Council Parking Bylaw 2019 (Parking Bylaw)

- a. Controls parking on roads or areas under the care, control or management of the Council.
- b. Precludes the display of signage on, or connected to a vehicle, or parked trailer that is on a road or a public place, if the principal function of the trailer or vehicle is to display advertising material;

3.5.3 Council Policy on Political Hoardings on Council Buildings and Land (S-CP 4460) precludes election signs on Council land or buildings in order for Council to remain fair and neutral to all candidates.

3.5.4 Council Policy on Business Zone 1 & 2 Public Places Policy 2018 (S-CP 0445) additional controls for signs on footpaths and accessways within Business 1 and 2 Zones.

3.5.5 Bylaw 2010 New Zealand Transport Agency (Signs on State Highways) Bylaw - Waka Kotahi controls signs on State Highway road reserve via this bylaw.

Reference to potential requirements from these documents has been included as an advice note.

3.6 Any other relevant legislation or regulations

The following legislation / regulations are relevant to this matter:

1. **Bylaw 2010 New Zealand Transport Agency (Signs on State Highways) Bylaw** - sets out requirements for signs on road reserve of State Highways. Requirements in this bylaw that are considered practical and relevant for the Signs Chapter have been included in the transport safety standards.

2. **Electoral Act 1993 & Electoral (Advertisements of a Specified Kind) Regulations 2005** - specify the requirements for general election signs, which would be considered 'official signs'.
3. **Reserves Act 1977** – provides for preparation of Reserve Management Plans, which include restrictions on signs located on reserves. Requirements under Reserve Management Plan have been noted in an advice note within the Signs Chapter.

The above legislation and bylaw are mentioned in the advice notes that outlines other possible requirements outside the District Plan.

3.7 Any plans of adjacent or other territorial authorities

The District Council is required to have regard to the extent to which the district plan needs to be consistent with the plans and proposed plans of adjacent territorial authorities under Section 74(2)(c) of the RMA.

The Waimakariri District is adjacent to Christchurch City Council, Selwyn District Council and Hurunui District Council. The Christchurch District Plan (CDP) and Hurunui District Plan (HDP) are both second generation district plans that became both operative in 2017 and 2018 respectively. The Selwyn District Plan is currently under review so both the Operative Selwyn District Plan (SDP) and Proposed Selwyn District Plan (PSDP) have been considered.

3.7.1 Christchurch District Plan

The CDP contains a range of rules and standards for managing signs. Its objective is for signs to contribute to the city's recovery and vitality by supporting business, infrastructure and community activities, maintaining public safety and enhancing character and amenity values. Policies include enabling signs in appropriate locations, controlling signs in sensitive locations, managing potential effects of signs, transport safety, temporary signs and signs managed by other agencies and managing off-site signs.

Overall, the CDP has a more lenient approach than the Proposed Waimakariri District Plan, with small scale off-site signs permitted in most zones subject to standards, and static and digital billboards permitted in certain zones subject to standards. This is reflective of the CDP being a plan for a large city, as opposed to a rural-based district. Area and height limits were benchmarked against those in the CDP as part of the development of the standards for the Proposed District Plan, as were transport safety standards.

The proposed provisions are generally consistent with the CDP in terms of its intent of balancing the need for signs with safety and amenity considerations. However, the Proposed Waimakariri District Plan is more restrictive on signs such as digital and static billboards/signs, and off-site signs which is reflective of it being a plan for a district with smaller urban environments.

3.7.3 Selwyn District Plans

3.7.3.1 Operative Selwyn District Plan

The Rural and Township Volumes of the operative SDP contain provisions for outdoor signs and noticeboards. Policies generally aim to manage effects on amenity values, transport safety and nuisance. Both volumes require resource consents for off-site signs and this approach has been carried through to the Proposed Selwyn District Plan and is consistent with the proposed provisions.

3.7.3.2 Proposed Selwyn District Plan

The PSDP's objective is for signs to contribute to the District's economic and community wellbeing, and transport safety. Policies include enabling signs integral to industrial, commercial, and community activities and infrastructure, managing signs to maintain urban design, character and amenity values, providing for temporary signs, avoiding off-site signs in Residential and Rural Zones and ensuring that off-site signs in all other zones are compatible with the character and amenity values of the surrounding area. Off-site signs in the General Rural Zone and all Residential Zones being non-complying activities, while elsewhere they are discretionary activities.

Notable differences from the proposed provisions include the absence of rules enabling subdivision development signs and local election signs, and the absence of controls for subdivision entrance signs and signs within or near areas with high natural and landscape values.

Area and height limits were benchmarked against those in the PSDP as part of the development of the standards for the Proposed District Plan, as were transport safety standards. Overall, the Proposed District Plan is generally consistent with the PSDP, particularly with its approach to managing off-site signs, area and height limits, and transport safety.

3.7.4 Operative Hurunui District Plan

The HDP contains rules for signs that are specific to the zone chapters they sit within. Policies in the Rural and Settlement Chapters include the aim of avoiding, remedying or mitigating the detrimental effects of signs on public safety and amenity values.

Both chapters require resource consent for off-site signs, and for cars, trailers and other vehicles used as signs or for the purpose of displaying signs (other than vehicles used in and as part of the normal course of businesses). Area and height limits were benchmarked against those in the HDP as part of the development of the standards for the Proposed District Plan, as were transport safety standards. Overall, the signage provisions of the Proposed District Plan are consistent with the intent of those in the HDP.

4. KEY RESOURCE MANAGEMENT ISSUE

Signs provide a range of important functions for business, infrastructure and community to advertise, identify, inform and warn thereby contributing to the District's economic and community wellbeing. However, in some instances, signs need careful management to ensure they do not create adverse effects on transport safety (by causing a distraction or obstruction to road users or pedestrians), character and amenity values (by creating visual clutter), or any applicable natural, landscape and heritage values of certain overlays.

This resource management issue was identified using sources of information including (but not limited to) the following:

- (a) Monitoring and review of Operative District Plan, including gap analysis;
- (b) Matters raised by District Planning and Regulation Committee;
- (c) Input from Council staff, external planning review of draft provisions, and light expert regarding an approach for illuminated signs; and
- (d) Matters raised by Waka Kotahi, a local signs company, Rangiora Promotions, Enterprise North Canterbury, and local real estate agents.

5. OVERVIEW OF PROPOSED OBJECTIVES, POLICIES AND METHODS

5.1 Strategic Direction

SD-02 aims to provide urban development that *'provides a good quality urban environment that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors'*. The proposed provisions for signs give effect to this objective by managing signs to a level that is in keeping with the character and amenity values of the zone it is located in and its vicinity.

SD-03 aims to provide improved accessibility and multi-modal connectivity through a safe and efficient transport network. The proposed provisions for signs give effect to this objective by ensuring signs do not adversely affect transport safety by causing a distraction or obstruction to road users and pedestrians.

5.2 District-wide Subject

This district-wide chapter contains objectives, policies and methods that manage signs.

5.3 Proposed Objective and Policies

An objective and five policies are proposed as follows:

| Objective |
|---|
| SIGN-O1 Safety, well-being and amenity Signs provide for the District's economic and community well-being without compromising transport safety, character and amenity values, landscape values, natural values or heritage values. |
| Policies |
| SIGN-P1 Enable specific signs Support: <ol style="list-style-type: none">1. the safe functioning of activities by enabling, while managing the effects of, official signs, off-site directional signs, and community signs; and2. the economic viability and functionality of activities within Commercial and Mixed Use Zones and Industrial Zones by enabling, while managing the effects of, on-site signs. |
| SIGN-P2 Temporary signs Provide for temporary signs relating to a temporary activity, real estate including subdivisions under development, and local elections while managing their size, height, duration and number in order to maintain amenity values and transport safety. |
| SIGN-P3 Transport safety Ensure signs do not adversely affect transport safety by causing a distraction or obstruction to road users and pedestrians by: <ol style="list-style-type: none">1. Managing the size, number, location, content, illumination, and design of signs;2. Limiting digital signs; and3. Managing off-site signs in industrial zones, and avoiding off-site signs in all other zones. |
| SIGN-P4 Amenity values and character Maintain the character and amenity values of zones by: <ol style="list-style-type: none">1. limiting the size, height and the number of freestanding signs;2. ensuring signs do not protrude above the roofline or fence line where attached to a building or fence; |

3. limiting the height of signs on verandahs in any Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone or Mixed Use Zone;
4. limiting the extent of signs on windows in any Town Centre Zone;
5. limiting proliferation of off-site signs by:
 - a. managing such signs in Industrial Zones including the interface with non-industrial zones; and
 - b. avoiding such signs in Residential Zones, Rural Zones, Commercial and Mixed Use Zones, Open Space and Recreation Zones, and Special Purpose Zones;
6. limiting digital signs; and
7. avoiding permanent signs identifying a subdivision development to support the integration of new developments with surrounding areas.

SIGN-P5 Signs in sensitive areas

Limit the type of signs:

1. within, or adjacent to, any Natural Open Space Zone, ONL, ONF, SAL, HNC, VHNC, ONC, or natural character of scheduled freshwater body setback, in order to maintain their associated natural values, natural character values or landscape values; and
2. within any historic heritage item or heritage setting in order to maintain their heritage values.

5.4 Proposed Methods

The following methods are proposed to implement the proposed objectives and policies:

5.4.1 Rules

The proposed rules will:

1. Enable official signs and internalised signs;
2. Provide for:
 - a. community signs;
 - b. temporary signs promoting and associated with temporary activities, real estate, subdivisions under development, and local elections;
 - c. on-site signs at a scale compatible with the receiving zone; and
 - d. off-site directional signs;
3. Manage signs in more sensitive environments such as Outstanding Natural Landscapes and Features, Significant Amenity Landscapes, High, Very High or Outstanding Natural Character areas, historic heritage items or settings, Natural Open Space Zones, or Natural character of scheduled freshwater body setbacks;
4. Manage off-site signs and permanent signs identifying a subdivision development name; and
5. Require most signs to meet standards relating to transport safety, limits on the display area, height, location or position on a structure, number of signs per site, digital signs, and limits on number of freestanding signs per site.

While signs on trailers or vehicles that have the primary purpose of advertising were identified as an issue that needed to be addressed with a specific rule, this has not been proposed as these signs are controlled by either the off-site signs rule or any other applicable rule (e.g. sign for temporary activities) and would need to meet all the standards for these signs (such as sign display area limits). The proposed definition of 'freestanding sign' includes signs on trailers or vehicles, as their character is more reflective of a freestanding sign.

5.4.2 Activity standards and Signs standards

Activity standards are proposed to manage:

- (a) Transport safety standards;
- (b) Maximum number of signs per site;
- (c) Maximum area and height of signs;
- (d) Controls over signs attached to structures;
- (e) Maximum number of freestanding signs per site;
- (f) Requirements for permitted digital signs; and
- (g) Setbacks for freestanding signs.

5.4.3 Other District Plan chapters

Rules of all zone and district-wide chapters apply, in particular:

1. any illuminated, or digital sign, would be required to meet the lux and glare limits for the receiving zone as outlined in the Light Chapter; and
2. earthworks associated with the foundation of any freestanding sign up to a depth of 200mm within any Site or Area of Significance to Maori is permitted in the Earthworks Chapter.

5.4.4 Methods outside the District Plan

Other methods used to manage signs are outlined in Section 3.5 and 3.6. Signs managed by the bylaws mentioned in these sections would be considered 'official signs' under the National Planning Standards definition as they are provided for under a statute, and/or relate to public safety. They are therefore permitted activities in the proposed signs rules subject to no activity standards.

5.4.5 Matters of discretion

Matters of discretion that are proposed are:

- (a) Transport safety;
- (b) Character and amenity values;
- (c) Heritage values; and
- (d) Natural and landscape values.

No non-notification clauses are proposed as signs typically face roads or public spaces therefore their effects are typically external (thus do not meet the non-notification clause criteria of being technical breaches or site internalised effects). A permitted activity rule (subject to no standards) is provided for internalised signs, which are a defined term.

5.4.6 Advice notes

Advice notes address the following matters:

- (a) Other potential regulatory requirements for signs outside the District Plan;
- (b) Requirements in the Light Chapter for light and glare for any illuminated sign, including any digital sign.
- (c) For historic heritage items, limiting of damage from signs and sign fixing points.
- (d) Local election signs are not permitted on District Council land or buildings as per the District Council Policy on Political Hoardings on Council Land and Buildings.

5.4.7 Definitions

Definitions are included for:

- (a) Sign (National Planning Standard definition);
- (b) Official sign (National Planning Standard definition);
- (c) Community sign;
- (d) Internalised sign;
- (e) On-site sign;
- (f) Off-site sign;
- (g) Off-site directional sign;
- (h) Local election sign;
- (i) Digital sign;
- (j) Primary building frontage;
- (k) Sign display area; and
- (l) Freestanding sign.

6. SCALE AND SIGNIFICANCE EVALUATION

Section 32 (1)(c) of the RMA requires that a Section 32 report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed objectives, policies and methods.

The level of detail undertaken for the subsequent evaluation of the proposed objectives, policies and methods has been determined by this scale and significance assessment.

In particular, Section 32 (1)(c) of the RMA requires that:

- (a) Any new proposals need to be examined for their appropriateness in achieving the purpose of the RMA;
- (b) The benefits and costs, and risks of new policies and methods on the community, the economy and the environment need to be clearly identified and assessed; and
- (c) All advice received from iwi authorities, and the response to the advice, needs to be summarised.

Further, the analysis has to be documented to assist stakeholders and decision-makers understand the rationale for the proposed objectives, policies and methods under consideration.

In making this assessment regard has been had to a range of scale and significance factors, including whether the provisions:

- (a) Are of regional or district wide significance;
- (b) Involve a matter of national importance in terms of Section 6 of the RMA;
- (c) Involve another matter under Section 7 of the RMA;
- (d) Raise any principles of the Treaty of Waitangi (Te Tiriti o Waitangi) under Section 8 of the RMA;
- (e) Address an existing or new resource management issue;
- (f) Adversely affect people's health and safety;
- (g) Adversely affect those with particular interests including Maori;
- (h) Adversely affect a large number of people;

- (i) Result in a significant change to the character and amenity of local communities;
- (j) Result in a significance change to development opportunities or land use options;
- (k) Limit options for future generations to remedy effects;
- (l) Whether the effects have been considered implicitly or explicitly by higher order documents;
and
- (m) Include regulations or other interventions that will impose significant costs on individuals or communities.

Policies and methods have been evaluated as a package, as together they address a particular issue and seek to meet a specific objective.

6.1 Evaluation of Scale and Significance

| | Low | Medium | High |
|--|-----|--------|------|
| Degree of change from the Operative Plan | ✓ | | |
| The provisions introduce a new, specific objective, and policies, rules, standards, and matters for discretion for signs. However they are not anticipated to result in significant change to the character and amenity values of the District, but provide greater clarity and certainty of requirements. | | | |
| Effects on matters of national importance | | ✓ | |
| The provisions limit the type of signs within, or adjacent to, any Outstanding Natural Features or Landscapes, coastal environment areas of High, Very High or Outstanding Natural Character, or natural character of scheduled freshwater body setback, in order to maintain their associated natural values, natural character values or landscape values. The provisions also limit the type of signs within any historic heritage item/setting in order to maintain heritage values. Therefore matters of national importance in Section 6(a), (b) and (f) of the RMA respectively are managed to some extent within the signs provisions. | | | |
| Scale of effects geographically (local, district wide, regional, national) | ✓ | | |
| The provisions apply district-wide however the scale of effects from an individual sign is typically relatively small scale geographically, affecting the surrounding area's amenity values, character, transport safety, and any natural, landscape or heritage values. | | | |
| Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?) | | ✓ | |
| The proposed provisions apply district wide. The provisions affect those wishing to erect signs and those within the surrounding area of any sign. Therefore they affect businesses, landowners, and the public generally. | | | |
| Scale of effects on those with specific interests, e.g., Mana Whenua, industry groups | | ✓ | |
| Businesses wishing to erect signs, along with the advertising industry in general, would be affected by these provisions. Waka Kotahi has a specific interest in transport safety of State Highways so is affected by the controls for signs adjoining them. | | | |
| 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? Is it consistent, inconsistent or contrary to those? | | | |
| In accordance with the National Planning Standards, the change to an activities-based plan format has resulted in a new chapter for signs. The CRPS is not directly relevant to the signs provisions. The provisions are generally consistent with the approach taken in other operative and proposed district plans, as outlined in Section 3.7. The transport safety requirements were developed in consideration with applicable Waka Kotahi guidance documents. | | | |
| Likelihood of increased costs or restrictions on individuals, communities or businesses | | ✓ | |
| It is likely that there will be some increased costs or restrictions on those wishing to erect certain signs, in order to manage effects on transport safety and to achieve the character and amenity values (and any applicable natural, landscape or heritage values) anticipated within zones (or applicable overlays). | | | |
| Summary - Scale and Significance | | | |
| Overall, there is a low to medium degree of change from the Operative Plan, in particular: <ul style="list-style-type: none"> a. the introduction of the separate chapter for signs is largely a formatting matter, aside from the introduction of a specific objective, policies and matters of discretion for signs; b. the rules from the Operative Plan around off-site signs, signs for temporary activities and local elections have largely been rolled over; c. the updated sign size and height limits were benchmarked against what is in the Operative Plan, Proposed Selwyn District Plan, Christchurch District Plan and Hurunui District Plan; and d. rules for subdivision development entrance signs and off-site directional signs were introduced to address specific issues. The level of detail in this report corresponds with the scale and significance anticipated from implementing the proposed provisions. | | | |

7. EVALUATION OF PROPOSED OBJECTIVE

Section 32(1)(a) of the RMA requires the District Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA. The level of detail undertaken for the evaluation of the proposed objective has been determined by the preceding scale and significance assessment. Below is a summary of the proposed objective that has been identified as the most appropriate to address the resource management issue(s) and achieve the purpose of the RMA, against those objectives in the Operative Plan.

7.1 Evaluation of Existing and Proposed Objectives

| Existing Objective (status quo) | Appropriateness to achieve the purpose of the Resource Management Act 1991 |
|---|--|
| <p><i>Objective 12.1.1</i> Maintain the amenity values and a quality of environment appropriate for different parts of the District which protects the health, safety and wellbeing of present and future generations, and ensure that any potential adverse environmental effects from buildings and structures, signs, glare, noise and hazardous</p> | <p>Relevance: This objective also applies to buildings, structures, glare, noise and hazardous substances. It does not directly or sufficiently address the key resource management issue set out in Section 4 of this report. Consequently, it provides insufficient direction and guidance to decision makers regarding the intended outcomes, specific activities and effects to be managed in relation to signs.</p> <p>The objective does not refer to the benefits of signs such as their role in providing for the District's economic and community wellbeing.</p> <p>The objective is broadly consistent with Part 2 of the RMA as it largely replicates s5, s7(c) and 7(f).</p> |

| Existing Objective (status quo) | Appropriateness to achieve the purpose of the Resource Management Act 1991 |
|---|--|
| <p>substances are avoided or mitigated.</p> | <p>Reasonableness: The objective provides very broad guidance for decision making in that it indicates the amenity values of the surrounding area should be maintained. It does not identify specific matters relating to signs that need to be considered (such as transport safety effects, provision for economic and community well-being) and thus leaves this consideration solely up to the decision maker. It does not distinguish between where effects should be avoided and where they should be mitigated.</p> <p>Achievability: The very broad scope of the objective means monitoring its outcomes would not be possible. Overall, the objective does not provide sufficient clarity, specificity and direction in relation to managing signs. This objective is therefore less appropriate to achieve Part 2 of the RMA than the proposed objective.</p> |
| Proposed Objective | Appropriateness to achieve the purpose of the RMA |
| <p>SIGN-O1 Safety, well-being and amenity Signs provide for the District's economic and community well-being without compromising transport safety, character and amenity values, landscape values, natural values or heritage values.</p> | <p>Relevance: The objective directly relates to the resource management issue identified in Section 4 of this report. These issues relate to matters outlined in s5, s6(a), 6(b), 6(f), s7(b), 7(c) and 7(f) of the RMA.</p> <p>Reasonableness: The objective identifies potential positive and negative effects of signs. It will provide specific guidance and direction to decision makers as it indicates that managing the negative effects is necessary, but also recognises positive benefits from signs.</p> <p>Achievability: The direction of the objective means that specific policies and methods can be derived from it to support its implementation (e.g. transport safety standards, size and number of signs appropriate for receiving zone). This objective is therefore the most appropriate option for achieving the purpose of the RMA.</p> |
| Alternative Objective | Appropriateness to achieve the purpose of the RMA |
| <p>No signs related provisions in the Proposed District Plan and instead full reliance on the Signs Bylaw to manage signs</p> | <p>Relevance: Section 145 of the Local Government Act 2002 limits territorial authorities to make bylaws only for the purpose of protecting the public from nuisance, protecting, promoting, and maintaining public health and safety, and minimising the potential for offensive behaviour in public places. The Signs Bylaw could not manage effects from signs relating to amenity values and character, natural, landscape, or heritage values so management would be limited to transport safety. It would therefore not fully address the identified resource management issue thus has minimal relevance.</p> <p>Reasonableness: As above, the bylaw approach would limit the management of the effects of signs to transport safety only thus would likely result in signs that adversely affect character, amenity, natural, landscape and heritage values. While this alternative objective would impose less of a regulatory impact on individuals, businesses, and the wider community than the proposed objective, it would likely result in negative outcomes for character and amenity values, and any natural, landscape and/or heritage values. It is therefore not a reasonable approach in addressing the resource management issue.</p> <p>Achievability:</p> |

| Existing Objective (status quo) | Appropriateness to achieve the purpose of the Resource Management Act 1991 |
|---------------------------------|--|
| | While this approach would technically be achievable to implement as the Signs Bylaw is currently in place, it would not be effective at addressing the full extent of the resource management issue. |

7.2 Summary - Evaluation of Proposed Objectives

The proposed objective recognises the benefits of signs, along with their potential adverse effects. This directly relates to the resource management issue relating to signs. These matters relate to those outlined in s5, s6(a), 6(b), 6(f), s7(b), 7(c) and 7(f) of the RMA. This objective is therefore the most appropriate option for achieving the purpose of the RMA as it provides specific guidance to decision makers.

8. EVALUATION OF PROPOSED POLICIES AND METHODS

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

The level of detail undertaken for the evaluation of the proposed policies and methods has been determined by the preceding scale and significance assessment.

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 proposed policies and methods, 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.

Policies and methods have been evaluated as a package, as together they address a particular issue and seek to meet a specific objective.

8.1 Evaluation of Proposed Policies and Methods

| Policy and method options | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
|----------------------------------|--|---|-------------------------------------|--|
|----------------------------------|--|---|-------------------------------------|--|

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|--|---|---|---|---|
| <p>ption A: Proposed Approach</p> <p>Policy and method options to achieve the District Plan objectives relating to signs</p> <ul style="list-style-type: none"> a. Enable official signs and internalised signs. b. Provide for community signs, temporary signs for temporary activities, real estate, subdivisions under development, and local elections. c. Provide for on-site signs at a scale compatible with the receiving zone. d. Provide for off-site directional signs. e. Manage signs in more sensitive environments. f. Manage off-site signs and permanent signs identifying a subdivision development name. g. Require most signs to meet standards relating to transport safety, limits on the display area, height, location or position on a structure, number of signs per site, digital signs, and limits on number of freestanding signs per site. | <p>Environmental: Character and amenity values of zones are maintained to an equivalent level for zone function and context (e.g. the utilitarian character of industrial zones means that larger on-site signs and off-site signs via a restricted discretionary resource consent pathway are appropriate while the contrary applies in more sensitive zones such as residential zones).</p> <p>Natural, landscape and heritage values of sensitive areas are maintained.</p> <p>Matters of discretion provide greater clarity and efficiency for decision making by limiting the scope to relevant matters only.</p> <p>Clear definition of terms provides greater certainty.</p> <p>There is a limit on the maximum number of freestanding signs on one site at any one time in order to address issues with high profile sites being cluttered with freestanding signs and the consequent issues with transport, safety and amenity values.</p> <p>Economic: Businesses, and other parties erecting signs, have greater certainty and clarity on requirements, including the relationship with Signage Bylaw.</p> <p>Transport safety effects of signs are managed by reducing issues associated with a distraction, confusion or</p> | <p>Environmental: No environmental costs are identified. However it is noted that for some members of the community, signs (particularly large off site signs) can adversely affect amenity values thus while these types of signs will be managed and limited, there is still potential for effects on amenity values.</p> <p>Economic: Provides limitations on the signs that may be erected as a permitted activity which may constrain activities which may have an economic cost.</p> <p>May require applications for resource consent for certain signs which has associated economic costs, including uncertainty.</p> <p>Provisions may initially appear more complex to plan users compared to the existing provisions, potentially resulting in a perceived cost from interpreting and applying the new rules.</p> <p>Social & Cultural Rules, activity standards and signs standards may appear more complex to plan users as they are longer in total compared to those in the Operative Plan.</p> | <p>The proposed policies and methods provide an efficient way to achieve the objective as the benefits of managing signs via this approach outweigh the costs.</p> <p>The proposed policies and methods are efficient as they clearly define the different types of signs and their specific requirements, thus providing a high level of certainty.</p> <p>The proposed policies and methods will effectively manage the amenity values and character, along with any applicable natural, landscape or heritage values, of the surrounding area of where a sign is located as the applicable signs limits are set at an appropriate level for that zone or sensitive area.</p> <p>The proposed transport safety standards (within both activity standards and signs standards) will effectively manage transport safety by ensuring signs do not cause confusion, a distraction or obstruction.</p> <p>Waka Kotahi guidance has been followed where considered appropriate. For example, this guidance precludes any sign within 100-200m of any intersection, pedestrian crossing, regulatory or warning sign, or curve with chevron sign. This requirement seemed impractical, particularly within urban environments given the high number of signs that are located in these areas (relative to rural areas), the low speed environment, and the lack of known transport safety issues associated with these signs, thus was not</p> | <p>Risks of not acting:</p> <ul style="list-style-type: none"> a. Failure to adequately address resource management issue. b. Transport safety standards would not be in line with current best practice. c. Off-site directional signs would not be provided for, thus increasing resource consent requirements for these signs. d. Subdivision development entrance signs may continue to be erected and thereby reduce residential neighbourhood cohesion and integration (character). e. Small scale digital signs would not be provided for. f. Operative Plan rules lack clarity and therefore certainty. <p>Risk of acting:</p> <ul style="list-style-type: none"> a. Businesses and other parties erecting signs will need time to understand the new requirements. b. Generally low risk as the provisions have been discussed with Waka Kotahi, and provisions such as the requirement for all of-site signs to apply for resource consent, which would likely be unsupported by billboard companies, is a roll-over from the Operative Plan and is consistent with rural-based neighbouring District Plans. <p>Overall, there is sufficient information to act and the risk from not acting is higher than the risk of acting.</p> |
|--|---|---|---|---|

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|--|--|--|---|--|
| | <p>obstruction caused by signs; thereby providing a more efficient and safe transport network, which in turn supports economic wellbeing.</p> <p>Community signs are provided for.</p> <p>Signs rules are more targeted to zone function and context, thereby reducing unnecessary restrictions and therefore cost.</p> <p>Social: Provides greater clarity and certainty on sign requirements.</p> <p>Enables signs for temporary activities such as community events.</p> <p>Maintains character and amenity values appropriate to zone function and context.</p> <p>Cultural: No specific cultural benefits are identified.</p> | | <p>an efficient or effective option for managing the issue of reducing distraction caused by signs at higher risk areas and would trigger a high volume of unnecessary resource consents.</p> <p>This requirement was instead added as an activity standard to rules for signs that have more flexibility in their location such as signs for temporary activities, local elections, subdivision developments and off-site directional signs) if within a speed environment of 60km/hr or more as this would target the higher risk speed environments and signs that are flexible in their location.</p> | |
|--|--|--|---|--|

| Policy and method options | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
|--|---|---|--|---|
| Opportunities for economic growth and employment | | | | |
| Greater certainty about requirements for signs within zones, along with greater certainty about anticipated amenity values within zones, may encourage residential, commercial or industrial growth. | | | | |
| Quantification Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. Given the assessment of the scale and significance of the proposed changes above it is considered that quantifying costs and benefits would add significant time and cost to the s32 evaluation processes. The evaluation in this report identifies where there may be additional cost(s), however the exact quantification of the benefits and costs discussed was not considered necessary, beneficial or practicable. | | | | |
| Options less appropriate to achieve the objective | | | | |
| Policy and method options | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
| Option B: Status Quo Continue with Operative Plan provisions | Environmental: Off-site signs would still require resource consent however it would be a non-complying activity in all zones (compared with restricted discretionary activity status in industrial zones under the proposed plan). Economic & Social: Businesses and other parties erecting signs would not need to adapt to new provisions. Cultural: No specific cultural benefits are identified. | Environmental: Natural, landscape and heritage values of sensitive areas are not maintained with respect to signs. There is no limit on the number of freestanding signs on one site at any one time which could result in an accumulation of freestanding signs at high profile sites thereby reducing amenity values and creating transport safety issues. Economic: Transport safety standards would not be as detailed which may result in signs causing confusion, or a distraction or obstruction | The Operative Plan provisions would partly give effect to the proposed objective but are limited in the extent to which they address transport safety and amenity and character. They also do not address effects of signs on the applicable natural, landscape and heritage values of sensitive areas. They would therefore not be as effective or efficient at achieving the purpose and principles of the RMA than the proposed provisions would be, nor would they implement the National Planning Standards. | Risk of acting (retaining status quo) a. National Planning Standards will not be implemented. b. Effects of signs on the applicable natural, landscape and heritage values of sensitive areas will not be managed. c. Small scale digital signs would require resource consent. d. Rules in place that lack clarity, certainty and specificity for managing signs. Risk of not acting (going with proposed provisions, not status quo) |

| Policy and method options | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
|----------------------------------|--|--|-------------------------------------|--|
| | | <p>thereby reducing the efficiency and safety of the roading network.</p> <p>Signs within open space zones would fall under the rural zone signs rules which would not be as fitting for their purpose and function.</p> <p>Less certainty of requirements for signs for businesses and community.</p> <p>Off-site directional signs would not be provided for, thus increasing resource consent requirements for these signs or precluding them and their benefits in providing directional function for remotely located businesses.</p> <p>Small scale digital signs (e.g. petrol station price signs, school noticeboards) would not be provided for thus adding compliance requirements for these types of small scale digital signs that do not need to be managed via a resource consent process.</p> | | <p>e. Businesses and other parties erecting signs will need time to understand the new requirements.</p> <p>f. Generally low risk as the provisions have been discussed with Waka Kotahi, and provisions such as the requirement for all of-site signs to apply for resource consent, which would likely be unsupported by billboard companies, is a roll-over from the Operative Plan and is consistent with rural-based neighbouring District Plans.</p> <p>g. There is sufficient information to identify that the risk of acting on the proposed provisions outweighs the risk of not acting and retaining the status quo.</p> |

| Policy and method options | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
|--|---|--|--|---|
| | | <p>Social: Community signs would not be provided for thus may have resource consent requirements and associated costs.</p> <p>Subdivision development entrance signs may continue to be erected and thereby reduce residential neighbourhood cohesion and integration.</p> <p>Cultural: No specific cultural costs are identified.</p> | | |
| Opportunities for economic growth and employment | | | | |
| There is less clarity and certainty in these Operative Plan provisions which would be less supportive of economic growth and employment. | | | | |
| | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
| <p>Option C: Alternative approach</p> <p>No signs provisions in District Plan, Signage Bylaw only.</p> | <p>Environmental: None identified.</p> <p>Economic: Reduced controls on signs would result in more advertising and reduced compliance costs, which may create some economic benefits.</p> <p>Social: Transport safety will still be managed.</p> | <p>Environmental: Reduced character and amenity values, along with any natural, landscape or heritage values from a likely proliferation of signs and larger, more obtrusive signs.</p> <p>Economic & Social: May result in an oversaturation of signs which</p> | As the Signage Bylaw approach would be limited to managing transport safety aspects, it would not be effective at addressing the aspects of the resource management issue relating to managing signs to maintain character, amenity values, and any landscape, natural or heritage values. | <p>Risk of acting (adopting alternative approach): Reduced character and amenity values, and any natural, landscape and heritage values. More subjective compliance requirements reducing certainty and clarity for those wishing to erect signs.</p> <p>Risk of not acting (adopting proposed provisions, not alternative approach):</p> |

| Policy and method options | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
|---------------------------|---|--|---|---|
| | <p>Cultural: No specific cultural benefits are identified.</p> | <p>may reduce effectiveness of all signs.</p> <p>The reduced character and amenity values, and any applicable natural, landscape or heritage values, may contribute to the District being less desirable place and consequent reduced social and economic community outcomes in terms of property values, economic growth, and community vibrancy.</p> <p>While the Signage Bylaw has provision to manage transport safety aspects, it is somewhat subjective which affects its certainty and clarity for those wishing to determine compliance.</p> <p>Cultural: Possible reduced cultural values within Sites of Significance to Maori due to a proliferation of signs.</p> | <p>This alternative approach would result in indirect costs to the community through reduced amenity values and character from a proliferation, with minimal community benefits as it would only manage transport safety. Its transport safety requirements are also more subjective than those in the proposed provisions which would result in reduced certainty and clarity for those wishing to erect signs. It would therefore not be efficient in achieving the proposed objective.</p> | <p>More regulation for all parties wishing to erect signs and consequent compliance costs.</p> |

Opportunities for economic growth and employment

As the transport safety requirements of the Signage Bylaw are more subjective (whether a sign *'obstructs the vision of, or access for, persons driving on a roadway or entering a roadway; or constitutes or be likely to constitute in any way a danger to the public'*) than the proposed provisions, there would likely be a greater level of non-compliance and therefore potentially a requirement for additional enforcement staff.

Also, as this alternative approach would likely result in a proliferation of signs, this would result in more demand for sign production companies. The more lenient controls on signs would also likely result in more advertising and some associated individual economic benefits would result from that.

| Policy and method options | Benefits environmental, economic, social and cultural effects anticipated, | Costs environmental, economic, social and cultural effects anticipated, | Efficiency and Effectiveness | Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions |
|---------------------------|---|--|------------------------------|---|
|---------------------------|---|--|------------------------------|---|

While these above aspects would result in additional employment opportunities, any economic benefits would likely be offset by the indirect impact of the reduced character and amenity values that the proliferation of signs would create through reduced social and economic community outcomes.

8.2 Summary - Evaluation of Proposed Policies and Methods

The proposed policies and methods are the most appropriate option to achieve the objective for signs as the benefits outweigh the costs and the methods efficiently give effect to the proposed objective by striking an appropriate balance between enablement and control of signs in order to address the identified resource management issue.

8. SUMMARY

The key resource management issue is the need for signs to provide for the District's economic and community well-being through promoting commercial and temporary activities, directing, warning and informing the public without compromising transport safety, character, amenity values, landscape values, natural values and/or heritage values.

The Operative Plan does not adequately address this issue. The proposed objective is the most appropriate way to achieve the purpose of the RMA for managing signs as the benefits outweigh the identified costs. The proposed policies and methods are the most appropriate way for achieving the objective, having considered other reasonably practicable options for achieving this objective, and assessing that they are the most efficient and effective provisions to achieve the proposed objective.