

**SUBMISSION ON THE PROPOSED WAIMAKARIRI DISTRICT PLAN**  
(Clause 6 First Schedule Resource Management Act 1991)

**To:** Proposed District Plan Submissions  
Waimakariri District Council  
Private Bag 1005  
Rangiora 7440

*Submission lodged via email –*  
[developmentplanning@wmk.govt.nz](mailto:developmentplanning@wmk.govt.nz)

**Submission on:** The proposed Waimakariri District Plan

**Submission by:** Go Media Limited

**Trade competition statement:** Go Media Limited could not gain an advantage in trade competition through this submission

**Submitter address:** Go Media Limited  
PO Box 36 343  
Merivale  
CHRISTCHURCH

*Please note the different address for service below.*

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## Introduction

1. These submissions are made by Go Media Limited (“Go Media”).
2. Go Media makes submissions in opposition to elements of the proposed Waimakariri District Plan.

## Statement of Interest and Background

3. Go Media Group Limited is one of the largest independent outdoor media providers in New Zealand. They are a progressive media supplier for agencies and direct clients seeking outdoor media solutions within New Zealand. Go Media operates a large billboard portfolio and operates bus advertising on all major urban route fleets.
4. Off-site Billboard advertising provides a positive contribution to social and economic wellbeing, by enabling businesses to advertise their products. They are an accepted part of the urban environment throughout New Zealand. The environmental effects of billboard advertising are able to be appropriately managed through design and location controls in a way that adverse effects are avoided.

5. Go Media has a strong involvement in community based projects and events with sponsorship of a number of events and organisations. Many of the organisations benefiting from sponsorship from Go Media would not otherwise be able to afford to pay for the exposure.
6. The majority of billboards comprise of reinforced printed PVC, laced, stapled or affixed in a number of ways to frames and structures, either wall mounted or free standing. Digital billboards are also being increasingly used, and the environmental effects of these are now well known to the point where Council's throughout New Zealand have provided for them in District Plans, and common activity standards have been adopted in many cases.
7. Go Media has been involved in submissions on District Plans throughout New Zealand, including Christchurch City, where provisions for billboards including digital advertising have been accepted and adopted.
8. Go Media seeks that recognition and provision for billboard advertising be provided in the Proposed Waimakariri District Plan.

### **Submission Summary**

9. Go Media's submissions are outlined in **Attachment 1**.
10. The key chapter of interest to Go Media is the "SIGN – Nga Tohu" chapter contained in Part 2 – General District Wide Matters. Go Media's main opposition focuses on that billboards should not be treated any differently from any other sign. The effects are no different to that of site related signage and ought to be solely controlled by the Built Form Standards which controls the area and number of signs within a particular zone rather than a blanket discretionary or non-complying activity status for all off site signage and billboards.
11. Go Media is concerned that the proposed rule will make Billboard advertising a non-complying activity in all zones within the District – including industrial zones.

### **Relief**

12. Go Media seeks the following decision from the Council:
  - a. grant the relief as set out in **Attachment 1**; and/or
  - b. grant any other consequential or similar relief that is necessary to deal with Go Media's concerns and the issues raised in this submission.

### **Hearing**

13. Go Media wishes to be heard in support of its submissions.

14. If others make similar submissions, Go Media will consider presenting a joint case with them at the hearing.

Submission signed for and on behalf of Go Media Limited



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**Resource Management Group Limited**  
26 November 2021

Address for service:

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C/- Resource Management Group  
PO Box 908  
Christchurch 8140

**Attachments:**

1. Submissions on proposed plan provisions

## Appendix One – Submission Details

General Relief Sought
Go Media Limited (Go Media) seek the amendments to the Proposed Waimakariri District Plan as detailed in the table that follows, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Provision	Submission	Relief Sought
<b>Part 1 Introduction and general provisions / Te whakamāramatanga – Interpretation / Definitions</b>		
<b>Sign Display Area</b>	<p>Go Media <b>supports</b> the definition of Sign Display Area, in that it:</p> <p>Specifies that support structures are excluded from measurement of sign area; and</p> <p>Provides that for any double-sided sign, or V-shaped sign with less than 30° at the apex, the sign display area shall be measured as the area of one side only, being the largest of any one side.</p>	<b>Retain</b> the definition of “Sign Display Area” as notified

Provision	Submission	Relief Sought
<b>Billboard</b>	<p>Go Media <b>seeks</b> the inclusion of a new definition of “Billboard”, which will facilitate the provision of a specific rules framework for billboard advertising, distinguished from that of small off-site signs which may be separately managed.</p> <p>The suggested wording is based on that included in the Operative Christchurch District Plan.</p>	<p><b>Include</b> new definition of billboard to read as follows:</p> <p><b><u>Billboard</u></b></p> <p><u>means an off-site sign of not less than 18m2 in area which is used to advertise goods, services, products or events that are not directly related to the use or activities occurring at the site on which the board is physically located. It includes both the display board and any associated supporting device whether permanent, temporary or moveable.</u></p>

Provision	Submission	Relief Sought
<b>Part 2 – District-wide matters / General District-wide matters / SIGN - Ngā tohu - Signs</b>		
<b>Objective SIGN-01</b>	<p>Go Media <b>supports</b> Objective SIGN-01 in that it acknowledges that 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>Go Media considers that billboards are able to be provided in appropriate locations and with appropriate controls that ensure that this objective is met.</p>	<b>Retain</b> Objective SIGN-01 as notified

Provision	Submission	Relief Sought
<b>Policy SIGN -P1</b>	<p>Go Media <b>opposes</b> policy SIGN-P1 in that it does not support the enabling of off-site signs.</p> <p>Off-site signs including billboards make an important contribution to the economic viability and functioning of activities within the wider district, and the effects of off-site signs are able to be managed in a similar manner to those of on-site signs.</p> <p>Go Media is concerned that the proposed policy discriminates against non-site related signage, with no environmental effects justification for doing so.</p>	<p><b>Amend</b> Policy SIGN P1 to read:</p> <p><b>Enable specific signs</b></p> <p>Support:</p> <ol style="list-style-type: none"> <li>1. the safe functioning of activities by enabling, while managing the effects of, official signs, off-site directional signs, and community signs; and</li> <li>2. the economic viability and functionality of activities within Commercial and Mixed Use Zones and Industrial Zones <u>and the wider district</u> by enabling, while managing the effects of on <u>and off-site signs including billboards</u>.</li> </ol>

Provision	Submission	Relief Sought
<b>Policy SIGN-P3</b>	<p>Go Media <b>opposes</b> policy SIGN-P3 in that it is intended to relate to transport safety, however it seeks to limit, manage and avoid digital and off-site signage in relation to specific zonings rather than in relation to the transport environment.</p> <p>There is no effects based reason to single out digital and off-site signs including billboards from any other signs from a traffic safety perspective, provided that effects are managed by appropriate rules. The first part of the policy is able to equally apply to any signage and the remaining parts are unnecessary from a traffic safety perspective.</p> <p>There is no effects based reason to limit digital signs per-se on the basis of transport safety. The effects of digital signs are able to be managed such that effects are comparable to those of non-digital signs.</p> <p>The proposed policy seeks to avoid off-site signs in all zones other than industrial zones – traffic safety is not a zone related issue.</p>	<p><b>Amend</b> Policy SIGN-P3 to read:</p> <p><b>Transport safety</b></p> <p>Ensure signs do not adversely affect transport safety by causing a distraction or obstruction to road users and pedestrians by <u>managing the size, number, location, content, illumination, and design of signs.</u> ÷</p> <ol style="list-style-type: none"> <li><del>1. managing the size, number, location, content, illumination, and design of signs;</del></li> <li><del>2. limiting digital signs; and</del></li> <li><del>3. managing off-site signs in Industrial Zones, and avoiding off-site signs in all other zones.</del></li> </ol>



Provision	Submission	Relief Sought
<b>Policy SIGN-P4</b>	<p>Go Media <b>opposes</b> policy SIGN-P4 in that it discriminates against off-site signage in a manner that is disproportionate to their environmental effects.</p> <p>The policy comes from a starting point that “proliferation” of off site signs is somehow an effect that should be limited, managed and avoided.</p> <p>It is considered that “proliferation” is not an effect in its own right that requires management. Rather, it is the cumulative effect of all signage (both on and off-site) that may affect amenity values and character of an area. An off-site sign is no more likely to result in ‘proliferation’ than an on-site sign.</p> <p>Cumulative effects of signs including off-site signs and billboards are able to be properly managed through activity standards. Commercial and Mixed Use environments are also able to accommodate such signs with appropriate controls.</p> <p>Go Media also opposes the proposed policy to limit digital signs, as there is no environmental effects based reason to do so, and it is noted that this policy is not reflected in the</p>	<p><b>Amend</b> Policy SIGN-P4 to read:</p> <p><b>Amenity values and character</b></p> <p>Maintain the character and amenity values of zones by:</p> <ol style="list-style-type: none"> <li>1. limiting the size, height and the number of freestanding signs;</li> <li>2. ensuring signs do not protrude above the roofline or fence line where attached to a building or fence;</li> <li>3. limiting the height of signs on verandahs in any Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone or Mixed Use Zone;</li> <li>4. limiting the extent of signs on windows in any Town Centre Zone;</li> <li>5. <del>limiting proliferation</del> <u>Managing the effects of off-site signs including billboards by:</u></li> </ol>

Provision	Submission	Relief Sought
	proposed rules in any case. It is considered that the effects of digital signage can be managed, rather than simply limiting them with no other justification.	<ul style="list-style-type: none"> <li>a. managing such signs in Industrial, <u>Commercial and Mixed Use Zones</u> including the interface with non-industrial zones; and</li> <li>b. avoiding <del>such signs</del> <u>off-site signs</u> in Residential Zones, Rural Zones, <del>Commercial and Mixed Use Zones</del>, Open Space and Recreation Zones, and Special Purpose Zones;</li> </ul> <p>6. <del>limiting</del> <u>managing the effects of</u> digital signs; and</p> <p>7. avoiding permanent signs identifying a subdivision development to support the integration of new developments with surrounding areas.</p>

Provision	Submission	Relief Sought
<b>SIGN-R7 – Any off-site sign</b>	<p>Go Media <b>opposes</b> rule SIGN-R7, in that it does not provide for off-site signage including billboards as a permitted activity with appropriate activity standards, in Industrial, Commercial or Mixed Use zones.</p> <p>Go Media considers that the environmental effects of off-site and billboard signage in these zones are able to be appropriately managed such that adverse cumulative effects are avoided, and are of a comparable nature to that of site related signage.</p> <p>Go Media is also concerned that the rule as drafted would mean that any off-site sign not complying with rules SIGN-S1 to SIGN-S5 would default to non-complying activity status, when any other permitted activity not complying with the same rules would only trigger a restricted discretionary activity resource consent. There is no effects based reason to treat off-site signs not complying with Sign Standards any differently to other signs.</p>	<p><b>Delete</b> Rule SIGN -R8 and <b>Insert</b> new Rules SIGN-R7, SIGN-R8 and SIGN-R9 to read as follows:</p> <p><b><u>SIGN-R7 – BILLBOARDS</u></b></p> <p><b><u>Industrial, Commercial and Mixed Use Zones</u></b></p> <p><b><u>Activity Status: PER</u></b></p> <p><u>Where:</u></p> <ol style="list-style-type: none"> <li><u>SIGN-S1 – SIGN – S5 are met</u></li> <li><u>Billboards are located on sites fronting strategic, arterial and/or collector roads.</u></li> <li><u>If located on any road with a speed limit of 60kph or greater any billboard shall not be located closer than 50m before or after any traffic signals that are located on the same side of the road as the billboard, and where the billboard is oriented towards traffic approaching the signals.</u></li> <li><u>The site shall have a minimum road frontage of 40 metres per billboard, provided that no more</u></li> </ol>

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	Go Media seeks that specific rules be included that will permit Billboard signs in Industrial, Commercial and Mixed Use zones subject to activity standards, based on those included in the Christchurch District Plan, and other off site signs subject to standards.	<p><u>than 2 billboards may be erected on any single site.</u></p> <p>5. <u>Any billboard shall not be located directly opposite or within 40 m of the boundary of any site within a residential zone.</u></p> <p><u>In addition, for digital display billboards:</u></p> <p>6. <u>The billboard shall result in no more than 10.0 lux spill (horizontal and vertical) of light when measured or calculated 2 metres within the boundary of any adjacent site and/or arterial road and/or collector road.</u></p> <p>7. <u>No live broadcast or pre-recorded video shall be displayed on the screen. Only still images shall be displayed with a minimum duration of 7 seconds.</u></p> <p>8. <u>There shall be no movement or animation of the images displayed on the screen.</u></p> <p>9. <u>The material displayed on the screen shall not contain any flashing images and the screen itself shall not contain any retro-reflective material.</u></p>

Provision	Submission	Relief Sought
		<p>10. <u>There shall be no transitions between still images apart from cross-dissolve of a maximum of 0.5 seconds.</u></p> <p>11. <u>There shall be no sound associated with the screen and no sound equipment is to be installed as part of the screen.</u></p> <p>12. <u>The screen shall incorporate lighting control to adjust brightness in line with ambient light levels.</u></p> <p>13. <u>The billboard shall not be located on or adjacent to a state highway with a speed limit that is 80km/hr or greater.</u></p> <p><b><u>Activity Status when compliance not achieved: RDIS</u></b></p> <p><b><u>Matters of discretion are restricted to:</u></b></p> <p><u>SIGN-MD1 - Transport safety</u></p> <p><u>SIGN-MD2 - Amenity values and character</u></p>

Provision	Submission	Relief Sought
		<p><b><u>SIGN-R8 – OFF-SITE SIGNS EXCLUDING BILLBOARDS</u></b></p> <p><b><u>Industrial, Commercial and Mixed Use Zones</u></b></p> <p><b><u>Activity Status: PER</u></b></p> <p><u>Where:</u></p> <ol style="list-style-type: none"> <li>1. <u>if located adjacent to a road with a speed limit greater than 60km/hr, shall be separated a minimum of 50m from any intersection, pedestrian crossing, or permanent regulatory sign, permanent warning sign or curve that has a chevron sign erected by the road controlling authority</u></li> <li>2. <u>No sign shall be located directly opposite or within 40 m of the boundary of any site within a residential zone.</u></li> <li>3. <u>Each sign shall be sealed and waterproof;</u></li> <li>4. <u>No sign shall have moving parts or changing images;</u></li> <li>5. <u>No sign shall be illuminated;</u></li> </ol>

Provision	Submission	Relief Sought
		<p>6. <u>Each sign shall have the name and address of the sign operator / provider and other contact details on the sign;</u></p> <p>7. <u>There shall be no more than three small off-site signs on each road frontage of any site.</u></p> <p>8. <u>SIGN-S1 – SIGN – S5 are met</u></p> <p><b><u>Activity Status when compliance not achieved: RDIS</u></b></p> <p><b><u>Matters of discretion are restricted to:</u></b></p> <p><u>SIGN-MD1 - Transport safety</u></p> <p><u>SIGN-MD2 - Amenity values and character</u></p>

Provision	Submission	Relief Sought
		<p><b><u>SIGN – R9 Any Off-Site Sign</u></b></p> <p><b><u>Rural Zones</u></b></p> <p><b><u>Residential Zones</u></b></p> <p><b><u>Open Space Zones</u></b></p> <p><b><u>Special Purpose Zone (Pines Beach and Kairaki Regeneration)</u></b></p> <p><b><u>Activity Status: NC</u></b></p> <p><b><u>Activity Status when compliance not achieved: N/A</u></b></p> <p><b>Renumber</b> rules SIGN-R8 – SIGN-R9 accordingly</p>
<p><b>Sign Standard SIGN-S2</b></p> <p><b>Maximum number, sign display area and height of signs per site</b></p>	<p>Go Media seeks that the standards for sign area and height be <b>amended</b> to provide for billboards and other off-site signs provided for under rules SIGN-R7 and SIGN-R8 as sought in this submission.</p>	<p><b>Amend</b> rule SIGN-S2 as follows:</p> <p><b><u>Type of Sign</u></b></p> <p><b><u>Billboards permitted under SIGN-R7</u></b></p>



Provision	Submission	Relief Sought
		<p><b><u>Rule reference Applicable Zone</u></b></p> <p><u>SIGN-R7</u></p> <p><u>All Industrial, Commercial and Mixed Use Zones</u></p> <p><b><u>Maximum Sign Display Area</u></b></p> <p><u>Any Billboard shall have a maximum sign display area of 28m2.</u></p> <p><b><u>Maximum Height</u></b></p> <p><u>Maximum height of freestanding Billboard when measured from ground level: 9m.</u></p> <p><u>Billboards on buildings or structures:</u></p> <ol style="list-style-type: none"> <li><u>1. Any Billboard attached to a building shall not protrude above the top of the façade of that building (refer to Figure SIGN-1).</u></li> </ol>

Provision	Submission	Relief Sought
		<p>2. <u>Any Billboard attached to a fence shall not protrude above the height of that fence (refer to Figure SIGN-2).</u></p> <p><b>Type of Sign</b></p> <p>Any off-site sign <u>excluding Billboards permitted under SIGN-R7</u></p> <p><b>Rule reference Applicable Zone</b></p> <p><u>SIGN-R7 R8</u></p> <p>All Industrial, <u>Commercial and Mixed Use</u> Zones</p> <p><b>Maximum Number of Signs</b></p> <p>Freestanding signs: There shall be a maximum of one per site.</p>

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		<p>Signs on structures: There shall be a maximum of one per site.</p> <p><b>Maximum Sign Display Area</b></p> <p>Each sign, either a freestanding sign and/or sign on structure, shall have a maximum sign display area of 4m<sup>2</sup>.</p> <p><b>Maximum Height</b></p> <p>Maximum height of freestanding sign when measured from ground level: 3m.</p> <p>Signs on buildings or structures:</p> <p>Any sign attached to a building shall not protrude above the top of the façade of that building (refer to Figure SIGN-1).</p> <p>Any sign attached to a fence shall not protrude above the height of that fence (refer to Figure SIGN-2).</p>

Provision	Submission	Relief Sought
<b>Sign Standard SIGN-S3</b>  <b>Digital</b>	<p>Go Media <b>opposes</b> rule SIGN-S3 <b>in part</b> to the extent that it imposes maximum display area requirements that differ from those which apply to permitted non-digital signs, and includes limits on the number and duration of images that may be displayed.</p> <p>There are no environmental effects based reasons to impose these limitations.</p>	<p><b>Amend</b> rule SIGN-S3 as follows:</p> <ol style="list-style-type: none"> <li>1. The digital sign shall only be located within any Commercial and Mixed Use Zones, Industrial Zones, Sport and Active Recreation Zone, Special Purpose Zone (Museum and Conference Centre), Special Purpose Zone (Hospital), Special Purpose Zone (Kaiapoi Regeneration), or Special Purpose Zone (Pegasus Resort);</li> <li><del>2. The digital sign shall have a maximum sign display area of 3m<sup>2</sup> per site;</del></li> <li>3. There shall be a maximum of one digital sign per site;</li> <li>4. The digital sign shall display static images or messages only;</li> <li><del>5. The digital sign shall display maximum of two different images or messages within a 24 hour period;</del></li> <li><del>6. The display time for each image or message on the digital sign shall be a minimum of one hour;</del></li> </ol>

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		<p>7. The digital sign shall be operated with a fail-safe feature where in the event of a malfunction, the images or messages will be replaced by a solid black colour until the malfunction is resolved;</p> <p>8. The digital sign shall not be located within any natural character of scheduled freshwater body setback;</p> <p>9. The digital sign shall not be located within any ONF, ONL, SAL, HNC, VHNC or ONC; and</p> <p>10. The digital sign shall be set back a minimum of 20m from any Residential Zones, Rural Zones, Open Space Zone, Natural Open Space Zone, any natural character of scheduled freshwater body setback, ONL, ONF, SAL, HNC, VHNC, or ONC.</p>