



Timaru District Council  
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## Further submission in support of, or in opposition to, submission on the Proposed Timaru District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Further submissions close on Friday 11 August 2023 at 5pm

To: Timaru District Council

This is a further submission in support of, or in opposition to, a submission on the **Proposed Timaru District Plan**.

Full name of person making further submission:

*Frank Costello*

Organisation name and contact (if representing a group or organisation):

*Go Media Ltd*

Only certain persons can make a further submission. Please select the option that applies.

I am:

- a person representing a relevant aspect of the public interest;
- a person who has an interest in the proposal that is greater than the interest the general public has;
- the local authority for the relevant area.

Please explain why you come within the category selected above:

*Go Media has made an earlier submission on items within the PDP for the TDC to which these further submissions relate. Go Media are both advantaged and disadvantaged and the economic and business interests of both itself and the wider community of Timaru are impacted by the PDP as notified.*

### Hearing options

I wish to be heard in support of my further submission?  Yes  No

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

Yes  No

Signature: \_\_\_\_\_ Date: *9/8/2023*

*(of person making submission or person authorised to make decision on behalf)*

**PLEASE NOTE** - A signature is not required if you submit this form electronically. By entering your name in the box above you are giving your authority for this application to proceed.

**Electronic address for service of person making further submission:**

**Telephone:** *027-229-4116*

**Postal address (or alternative method of service under section 352 of the Act):**

*Go Media Ltd, PO box 36-375, Christchurch*

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

**You have served a copy of the further submission on the original submitter (this is required under the Resource Management Act 1991 Schedule 1, s8A(2) to be completed within 5 working days after it is served on the Timaru District Council)**  Yes  No

**Further submissions close on Friday 11 August 2023 at 5pm.**

Name of person making further submission: Go Media Ltd						
This further submission is in relation to the original submission of: <i>Enter the name of the original submitter as per the SoDR. E.g. Timaru District Council</i>	This further submission is in relation to the original submission Number: <i>enter the unique submission number as per the SoDR. E.g. 42.45</i>	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: <i>Support or oppose</i>	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Waka Kotahi NZ Transport Agency	143.11	Supports definition of Off-site Sign.	Support	The definition of 'off-site sign' is plain and unambiguous and should be retained.	Allow	Retain the definition of 'off-site sign' as notified.
ANSTAR Limited	47.1	Opposes that SIGN-R4 does not provide for off-site signs as a permitted activity within Industrial, Commercial or Mixed-Use Zones despite manageable and comparable effects to on-site signs. Considers there is no basis for default to non-complying activity status.	Support	OOHMAA's primary submission seeks amendments to Rule SIGN-R4 to amend the activity status that applies to 'off-site signs'. OOHMAA supports the submission noting that it similarly seeks a less onerous activity status for off-site signs. OOHMAA agrees with the reasons provided by the submitter, namely that the effects of on-site and off-site signage are comparable, and the activities should be consistently managed by the Proposed District Plan.	Allow	Accept the relief sought by the submitter. Alternatively, accept the relief sought by OOHMAA in its primary submission.
Waka Kotahi NZ Transport Agency	143.125	Support SIGN-S1, however, request that clause 3 be amended to cover all signs visible from a road. Considers Council should also consider whether additional standards such as sight distances, maximum number of words/elements should be added to this standards. The Traffic Control Devices Manual - Part 3 Advertising Signs (Appendix 1) gives direction to these standards to reduce potential traffic safety effects.	Oppose	OOHMAA does not support further standards in relation to sight distances or maximum number of words/elements. Such standards would be unworkable and onerous on the design of signage, which typically utilises combinations of words, logos, colours and text to impart a message in an effective manner. OOHMAA also does not support the amendment sought to require traffic safety standards to apply to all signs. The notified standard that applies only to signs within 10m of a road is appropriate.	Disallow	Retain Standard SIGN-S1, subject to the amendments sought by OOHMAA in its primary submission.
Waka Kotahi NZ Transport Agency	143.126	Supports this standard (clause 8) which states that no digital billboard shall be located adjoining a state highway. However, it is sought that the standard also provides for discretion of adverse effects on traffic safety, which is a key consideration when assessing digital billboards as they have the ability to distract the attention of road users and result in traffic safety effects.	Support in part	OOHMAA's primary submission seeks a range of amendments to Standard SIGN-S2. Without derogating from its submission, OOHMAA supports the submission by Waka Kotahi NZ Transport Agency in respect of the inclusion of 'traffic safety effects' as a matter of discretion that will apply to the consideration of an infringement of this standard.	Allow in part	Accept the relief sought by the submitter to insert "any adverse effects on traffic safety" as a matter of discretion to SIGN-S2.
Waka Kotahi NZ Transport Agency	143.128	Supports this standard which limits the number of signs (excluding official and temporary signs) per site, however, if this standard is not met, Waka Kotahi suggest that the matters of discretion should be extended to include potential effects on traffic safety.	Support	Without derogating from its submission, OOHMAA supports the submission by Waka Kotahi NZ Transport Agency in respect of the inclusion of 'traffic safety effects' as a matter of discretion that will apply to the consideration of an infringement of standard SIGN-S6.	Allow	Accept the relief sought by the submitter to insert "any adverse effects on traffic safety" as a matter of discretion to SIGN-S6.
Waka Kotahi NZ Transport Agency	143.129	Suggest that Table 27 should be amended to better reflect Table 6.2 of the TCD Manual:	Oppose	OOHMAA does not consider that minimum lettering size standards are reasonable or practicable for the design of advertising messages, which comprise a range of text-based messages, and can include text such as 'legal fine print' and other text which is necessary for a range of reasons but which is not required to be read in order for the main message to be understood. Further, it is ambiguous what constitutes a 'primary message' or a 'secondary message'. While Table 27, as notified, suffers from the same issues, the relief sought by the submitter seeks to increase the minimum lettering size on signs in low speed environments which is not appropriate.	Disallow	Retain Table 27 as notified.
Out of Home Media Association of Aotearoa	188.2	Supports the Introduction to the Signs Chapter which appropriately recognises the benefits of signs to people and communities and also appropriately recognises the potential effects of signs, and that it is necessary to manage such effects.	support	as per original submission	allow	Retain <b>Introduction of Signs Chapter</b> as notified.
Out of Home Media Association of Aotearoa	188.3		support	as per original submission	allow	Retain as notified.

Out of Home Media Association of Aotearoa	188.4	Supports the intent of the policy but the RMA (Resource Management Act) is not a 'nil' effect statute so there is no justification for requiring all adverse effects to be avoided. The submitter considers that achieving all adverse effects to be avoided will not be possible to achieve in commercial, mixed use, industrial and port areas where advertising is prevalent.	support	OOMAA's recommendation is appropriate	Amend	Amend <b>SIGN-P1</b> as follows:  <b>SIGN-P1 Managing the effects of signs</b> Enable signs in all zones, but require signs to: [...] 3. not contribute to <u>unacceptable</u> visual clutter or cumulative effects.
Out of Home Media Association of Aotearoa	188.5	Supports the intention of SIGN-P2, but it should be directed to managing signage to ensure that the effects of the potential for distraction are acceptable. The submitter mentions research that concludes that outdoor advertising does not result in unacceptable traffic safety effects. [See original submission for full reasons]	support	OOMAA's recommendation is appropriate	Amend	Amend <b>SIGN-P2</b> as follows:  <b>SIGN-P2 Managing Road Safety</b> Require that signs are designed and located so they do not compromise the safe use of any road by motorists, pedestrians and other road users, by:  [...]  3. ensuring sign proliferation, illumination levels, light spill, flashing and moving images and digital signs do not cause <u>unacceptable effects of</u> distraction; [...]
Out of Home Media Association of Aotearoa	188.6	Opposes SIGN-P3, which seeks to avoid new 'off-site commercial advertising signs' unless certain criteria are met, as it will place a significant burden on an applicant to demonstrate there is no precedence, no cumulative effects or no similar applications. The submitter believes the policy, combined with non-complying activity status will not deliver on many Strategic Directions and commercial zones objectives.	support	OOMAA's recommendation is appropriate	allow	Amend <b>SIGN-P3</b> as follows:  <b>SIGN-P3 Offsite <del>Commercial advertising</del> signs</b>  <del>Avoid Provide for</del> new off-site <del>commercial advertising</del> signs not provided for under SIGN-P4, <del>unless where</del> : 1. <del>it can be demonstrated it will not establish a precedent or result in similar applications to request equivalent treatment they are of an appropriate size, design and location</del> ; and 2. <del>they will not create unacceptable cumulative adverse effects</del> ; and
Out of Home Media Association of Aotearoa	188.7	SIGN-R4 Any signs not otherwise address in the Rules section of this chapter commercial advertising signs' can be dealt with on a broadly discretionary basis. The submitter believes the S.32 does not adequately describe or consider alternatives, or assess the change from the status quo. Opposes SIGN-R4 as the Non-complying activity status for 'offsite commercial signage' across all zones will result in an unreasonable and unnecessarily onerous resource consent process. Amenity and transportation effects of 'off-site signs	support	OOMAA's recommendation is appropriate	allow	Amend <b>SIGN-R4 Any signs not otherwise address in the Rules section of this chapter</b> to apply the following activity status to off-site signs:  Discretionary activity within the Commercial and Mixed Use zones, the General Industrial Zone and Port Zone  Non-complying activity within the Residential Zones, Rural Zones, Māori Purpose Zone, Open space and recreation zones
Out of Home Media Association of Aotearoa	188.8	Considers SIGN-S1 needs to be amended as the minimum setback distances between signs which are within 10m of a legal road, is too onerous and impracticable to comply with, particular in urban commercial environments where the density and 'spacing' of commercial activities will invariably result in closely spaced signage, and will lead to inefficient resource consent processes.	support	the recommendations of OOMAA are appropriate	Amend	Amend <b>SIGN-S1</b> as follows:  <b>SIGN-S1 Traffic Safety</b> [...]

						<p>3. All signs within 10 horizontal metres of a road must comply with the minimum lettering sizes in Table 27 - Minimum lettering size.</p> <p>4. <del>All signs within 10 horizontal metres of a road must comply with the minimum setback distances from other signs as read from one direction and measured parallel to the centre line of the road in Table 28 - Separation distances -</del></p>
Out of Home Media Association of Aotearoa	188.9	Opposes SIGN -S2 as several of the proposed standards are overly onerous and are not justifiably necessary. The submitter provides examples of research, safety information and examples of how signage is managed at intersections.	support	the ammendments proposed are more consistent with other regions and more fit for purpose.	Amend	<p>Amend <b>SIGN-S2</b> as follows:</p> <p><b>SIGN-S2 Illuminated, moving, flashing and digital signs</b> [...]</p> <p>2. Any illuminated, moving, flashing or digital display sign must only display still images, and where multiple still images are displayed, each still image must be displayed for a minimum of <del>30</del> <b>8</b> seconds each before changing to a different still image, and there must be no transitions between still images apart from cross-dissolve of a maximum of 0.5 seconds.</p> <p>3. <del>No illuminated, moving, flashing or digital display sign must be visible to vehicles travelling on a legal road within 100 metres of an intersection.</del></p> <p>[...]</p> <p>7. Illumination levels of any sign must not exceed <del>2000</del> <b>5000</b> candelas per square metre between sunrise and sunset.</p> <p>8. <del>No digital sign is to be located adjoining a State Highway.</del></p>
Out of Home Media Association of Aotearoa	188.1	Considers a maximum height of 4m is insufficient and does not reflect the common use of taller signs. Considers signs with a maximum height of 8m is more appropriate, noting that building height standards within these zones ranges between 10m and 20m.	support	the area as porposed is onerous the figure given by OOMAA is more apporprate	Amend	<p>Amend <b>SIGN-S3</b> as follows:</p> <p><b>SIGN-S3 Maximum Height of Signage</b> <b>1. All Zones</b> Any temporary sign must not exceed 3m in height, measured from ground level. <b>2. Commercial and Mixed Use zones Open Space and Recreation zones</b></p> <p><b>General Industrial Zone Port Zone</b> 1. Any freestanding sign must not exceed <del>4m</del> <b>8m</b> in height, measured from ground level.</p> <p>[...]</p>
Out of Home Media Association of Aotearoa	188.11	Amend Standard SIGN-S4 as a 5m <sup>2</sup> maximum area standard for free-standing signs in commercial and mixed use environments is insufficient, and does not recognise or provide for the requirements for effective commercial signs. A maximum area of 20m <sup>2</sup> is more appropriate, and that the effects of larger signs are able to be readily assessed through the resource consent process.	support	the area as porposed is onerous the figure given by OOMAA is more apporprate	Amend	<p>Amend <b>SIGN-S4</b> as follows:</p> <p><b>SIGN -S4 Maximum area of a sign</b> <b>1. All Zones</b> 1. Any temporary sign must not exceed 2m<sup>2</sup> in area but may be double sided. Where a sign is double sided, the maximum area of the sign is calculated as the area of one side of the sign. <b>2. Commercial and Mixed Use zones.</b> Any freestanding sign must not exceed <del>5</del> <b>20</b> m<sup>2</sup> in area. [...]</p>
Out of Home Media Association of Aotearoa	188.12	Supports Standard SIGN-S6 which does not limit the number of signs on a site in the Commercial and Mixed Use zones General Industrial Zone, and the Port Zone.	support		allow	Retain as notified.
Out of Home Media Association of Aotearoa	188.13	Opposes the minimum separation distance between Signs. Considers the separation distances between signs which is too onerous and impracticable to comply with, particular in urban commercial environments where the density and 'spacing' of commercial activities will invariably result in closely spaced signage, and will lead to inefficient resource consent processes.	support	not fit for purpose	allow	Delete <b>Table 28 - Separation of distances.</b>