

Appendix 3: Supporting Technical Report

STATEMENT OF EVIDENCE OF GABI WOLFER

BEFORE THE SELWYN DISTRICT COUNCIL HEARING PANEL

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of the DISTRICT PLAN REVIEW

**STATEMENT OF EVIDENCE OF GABI WOLFER
ON BEHALF OF SELWYN DISTRICT COUNCIL**

SIGNS

20/12/2021

TABLE OF CONTENT

1. INTRODUCTION	3
2. SCOPE.....	3
3. SUMMARY OF RECOMMENDATIONS	4
4. CONTEXT OF REVIEW	6
5. REVIEW OF SUBMISSION POINTS	7
6. SUBMISSIONS ON EXEMPTION OF FREE-STANDING SIGNS	8
7. SUBMISSION ON SIGNAGE LIMITS OF FREE-STANDING SIGNS	10
8. SUBMISSION ON SIGNAGE ON BUILDINGS.....	13
9. SUBMISSION ON LED AND DIGITAL LIGHTING	13

1. INTRODUCTION

- 1.1 My full name is Gabriele Tanja Wolfer. I have been working for Selwyn District Council as their Senior Urban Designer/Town Planner for the past 10 years.
- 1.2 I hold a Master's degree in Urban and Spatial planning from Technical University Kaiserslautern, Germany which I gained in 2004. I have more than 15 years' experience in both the public and private sectors. I am an Associate member of the New Zealand Planning Institute (NZPI) and a member of the Architectural Institute Rhineland-Palatinate, Germany.
- 1.3 Prior to my current role I have worked as the Town Planner for a private consultancy designing and developing masterplans for residential and commercial developments nationwide. Since 2008 I have been working within the Council's Policy and Strategy team. My work includes design reviews of commercial and residential proposals and providing expert evidence for private plan changes.
- 1.4 I am the co-author of the Selwyn Commercial Design Guide, which won a New Zealand Planning Institute Best Practise Award in 2012 and have developed the Lincoln Town Centre Plan (2016) and more recently the Rolleston Town Centre guide (2020), both strategic framework documents to assist in the implementation of best practise urban design in Selwyn's urban environments.
- 1.5 I have been asked to give evidence on the submissions received on the Signs chapter that forms part of the Proposed Selwyn District Plan (PDP).
- 1.6 The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:
 - a. Section 32 report – Signs
 - b. DW008- Signage (Baseline report)
 - c. Preferred Option Report for signage
 - d. SDC-Commercial Development Design Guide, 2011

2. SCOPE

- 2.1 The specific part of the PDP that my evidence relates to are Urban Design Matters within the signs chapter raised by submitters. I will specifically address:
 - a. the purpose and role of signs in Selwyn's town centres, commercial and mixed use and industrial zones;
 - b. exemptions to free-standing signs in GRUZ-PREC1
 - c. signage size limits of free-standing signs in LFRZ, GIZ and TCZ
 - d. signage amount limits on building façades
 - e. effects of LED and digital signage;
 - f. submissions and further submissions received in regard to the above.

3. SUMMARY OF RECOMMENDATIONS

3.1 The summary of recommendations is provided for free-standing signs, signs attached to buildings and LED& Digital signage. Please refer to points 5.-9. for an evaluation of the submissions and further submissions on the topics as listed below.

'Free-standing signs'

3.2 The submission made by Ceres Professional Trustee Company Ltd. & Sally Jean Tothill¹ relates to free-standing signs in the GRUZ-PREC1 zone.

3.3 Part one of the submission seeks to exempt GRUZ-PREC1 from rule SIGN-REQ1 point 8 and include GRUZ-PPREC1 within the requirement for signage in the LFRZ, GIZ, PORTZ and DPZ.

3.4 Part 2 seeks alternatively to increase the amount and size of free-standing signs per site within GRUZ-PREC1 and the current compliance status to be changed to restricted discretionary.

3.5 I agree with the submission in part and recommend changes to SIGN-REQ1 as follows:

SIGN-REQ1	Free Standing Signs	
GRUZ (<u>excluding</u> <u>GRUZ PREC-1</u>)	8. There shall be a maximum of one free standing sign per site for sites 4ha or less in area. 9. There shall be a maximum of three free standing signs per site for sites over 4ha in area. Signs shall be a minimum of 50m apart. 10. The maximum area of a sign shall be 3m ² . 11. The maximum height above ground level at the top of the sign shall be 6m.	Activity status when compliance not achieved: 12. When compliance with any of SIGN-REQ1.8.-1.12. not achieved: RDIS Matters for discretion: 13. The exercise of discretion in relation to SIGN-REQ1.13. is restricted to the following matters: a. SIGN-MAT1
<u>GRUZ PREC-1</u>	14. <u>There shall be a maximum of two free standing signs per site. The maximum area of all signs shall be no more than 12m². The maximum height above ground level at the top of the sign shall be 6m.</u>	Activity status when compliance not achieved: <u>15. When compliance with any of SIGN-REQ1.14 not achieved: RDIS</u> - Matters for discretion: <u>16. The exercise of discretion in relation to SIGN-REQ1.16. is restricted to the following matters:</u> a. <u>SIGN-MAT1</u>

¹ DPR-0346.018 Ceres Professional & Sally Tothill

- 3.6 The submission made by submitter Woolworths New Zealand² relates to free-standing signs in the LFRZ and GIZ zone. The submitter seeks to amend SIGN-REQ1.15. to allow the maximum area of a sign to be 27m² instead of 18m².
- 3.7 A second submission point³ made by submitter Woolworths New Zealand relates to free-standing signs in the TCZ zone. The submitter seeks to amend SIGN-REQ1.21.b. to allow the maximum area of a sign to be 27m².
- 3.8 **Recommendation to decline the submitters' request to increase the maximum free-standing sign area in TCZ, LRFZ and GIZ zones to 27m².**
- 3.9 A further submission was made by K&B Williams⁴, which does not specify signage, but as part of the site design requested signage to be considered. The submission relates to zone provisions, access and layout that may affect the submitter's land on Marshs Road.
- 3.10 Recommendation to consider the submitters request when addressing other site layout matters.

'Signs attached to buildings'

- 3.11 The submission made by Rolleston Square Ltd.⁵ relates to all zones not otherwise specified. The submitter seeks the SIGN-TABLE1 to be amended to allow for 40% of primary building façade to be used for signage. The submission also seeks to clarify that signage attached to windows does not count towards the allowance for signage.
- 3.12 **I agree with the submission in part and recommend changes to SIGN-TABLE 1 as follows:**

SIGN-TABLE 1- Signs attached to Buildings:		
Zone	Total maximum area of signs per building	Maximum height above ground level at top of sign
All Zones not otherwise specified including KNOZ where not for education purposes	<u>Signage does not occupy more than 25% of the primary building façade.</u>	Façade height

- 3.13 The submission made by Woolworths New Zealand Ltd.⁶ relates to GIZ and LFRZ. The submitter seeks that the reference to GIZ and LFRZ being subject to building length along primary building frontage x2m permitted area m² to be deleted from the total maximum area of signs per building column.
- 3.14 **Recommendation to decline the submitter's request.**

² DPR-0396.027 Woolworths

³ DPR-0396.028 Woolworths

⁴ DPR-0157.FS022 Waka Kotahi

⁵ DPR-0386.003 Rolleston Square

⁶ DPR-0396.029 Woolworths

- 3.15 A further submission made by Waka Kotahi NZ Transport Agency⁷ seeks Council to consider the implications of the requested relief and how the number and size of signs attached to buildings will be appropriately managed to minimize adverse effects on the safety of road users.

3.16 **Recommendation to acknowledge the submitter's request.**

'LED and Digital signage'

- 3.17 The submission made by Go Media Ltd.⁸ relates to the PSDP in its entirety and particularly the Signs Chapter and associated definitions. There are three parts to the submission (DPR-050.001, 002 and 003).

- 3.18 The submitter seeks the PSDP to: a) recognise the positive effects of digital advertising and enable this signage in the Selwyn District; b) treat off-site signage the same way as on-site signage; c) to have off-site related digital advertising as a separately listed permitted activity and where compliance cannot be achieved, a restricted discretionary activity status be applied; and d) that Sign-REQ6 and Sign- MAT2 to be deleted.

3.19 **Recommendation to decline the submitter's requests.**

- 3.20 Further submission made by Waka Kotahi NZ Transport Agency⁹ seeks Council to: a) reject the proposal to expressly enable digital signage; b) reject the proposal to expressly enable off-site signage; and c) reject the request for off-site digital signs to be a permitted activity and retain the discretionary and non-complying statuses for off-site signs.

3.21 **Recommendation to approve the submitter's requests.**

4. CONTEXT OF REVIEW

- 4.1 All the submissions that have been reviewed relate to either Free Standing Signs (referred to as 'FS signs') relating to SIGNS-REQ1 or Signs attached to buildings (referred to as 'attached signs') relating to SIGNS-REQ2 of the PDP.

- 4.2 The submissions seek changes to how signage is managed in the GRUZ, TCZ, GIZ and LFRZ of the PDP. In my opinion, the assessment of signage needs to be undertaken in the context of the receiving environment and the respective land use zones and overlays. For example, the associated levels of amenity in a RESZ are more susceptible to any adverse visual effects of signage compared to a GIZ.

- 4.3 Within this review I have addressed the key matters in regard to following questions:

- a. The location of the proposal and expected character and amenity in that zone
- b. Function of signs and if there are benefits from the change
- c. Placement of signs on buildings and on site for safety and function

⁷ DPR-0375.FS204 Waka Kotahi

⁸ DPR-0250.001, DPR-0250.002, DPR-0250.003 Go Media

⁹ DPR-0375.FS180, DPR-0375.FS181, DPR-0375.FS182 Waka Kotahi

- d. Number of signs to avoid visual clutter
 - e. Regulate size to keep amenity and character in context with surrounds
 - f. Effects on the receiving environment including safety, amenity and visual effects
- 4.4 The need and benefits of providing signage to businesses and the community needs to be provided with the amenity and character outcomes anticipated within the various zones. Best practice outcomes achieve a balance by managing the extent (size and placement) and location of signs, particularly in sensitive environments. Provided that signs are designed as an ancillary element to a primary activity, negative aspects, such as creating visual clutter and inappropriate placement, can be avoided, maintaining a level of amenity appropriate to the surrounding context.

5. REVIEW OF SUBMISSION POINTS

- 5.1 Of the received submissions and further submission points that Council has received on signs and that relate to Urban Design three submissions oppose, four that oppose in part and one further submission, which neither supporting nor opposing. 12 submissions are in support of the provisions and request that they are adopted.

- 5.2 I have reviewed the following submission points:

- DPR-0346.018- Ceres Professional Trustee company Ltd. & Sally Jean Tothill
- DPR-0386.003- Rolleston Square Ltd.
- DPR-0396.027- Woolworth NZ Ltd.
- DPR-0396.028- Woolworth NZ Ltd.
- DPR-0396.029- Woolworth NZ Ltd.
- DPR-0250.001, 002, 003 Go Media Ltd.

- 5.3 I have reviewed the following further submission points:

- DPR-0375.FS198- Waka Kotahi NZ Transport Agency
- DPR-0375.FS204- Waka Kotahi NZ Transport Agency
- DPR-0157.FS022- Kevin and Bonnie Williams
- DPR-0375.FS180, 181, 182 - Waka Kotahi NZ Transport Agency

6. SUBMISSIONS ON EXEMPTION OF FREE-STANDING SIGNS IN GRUZ-PREC1 ZONE

- 6.1 The submission made by Ceres Professional Trustee Company Ltd. & Sally Jean Tothill¹⁰ relates to free-standing signs in the GRUZ-PREC1 zone. The decision requested is twofold.
- 6.2 The first aspect of the submission seeks to exempt GRUZ-PRREC1 from rule REQ1 point 8 and include GRUZ-PRREC1 within the standard for signage in a LFRZ, GIZ, PORTZ and DPZ zone. GRUZ- PREC1 is a new overlay that has been proposed as part of the PSDPR. The request is therefore reliant on the acceptance of this new precinct.

¹⁰ DPR-0346.018 Ceres Professional & Sally Tothill

- 6.3 The second aspect of the submission seeks as an alternative to increase the amount and size of free-standing signs per site within GRUZ-PREC1 and the current compliance status to be changed to restricted discretionary.
- 6.4 The submitter seeks to increase the amount of signage in GRUZ- PREC1 from 1 to 2 per site and the size of each sign from 3m² to 6m², in essence doubling the amount and number of signs per site currently permitted within GRUZ, but less than what is permitted within a GIZ.
- 6.5 The applicant provides an assessment as to why the proposed request should be granted, elaborating on the fact that due to the location of the proposed GRUZ-PREC1 in-between SH1 will not result in any amenity loss or vistas being affected.
- 6.6 Having reviewed the location of the proposed GRUZ-PREC1, I agree with the submitter. The GRUZ-PREC1 is contained within a confined area, which is a triangle shaped land holding surrounded on all sides by the Southern Motorway. This roading configuration creates a physical buffer between the on-site activities within the proposed precinct and their effects on the adjacent Rural (Inner Plains) zone.
- 6.7 Considering the characteristics of the receiving environment, including the proximity of the proposed GRUZ-PREC1 to an Industrial zone located immediately to the north of the Southern Motorway, I consider that signage within the precinct should be more permissive than what is recommended within a rural zone.
- 6.8 I agree with the submitter that the area is dominated by motorway infrastructure, transmission lines and the built development of the Heavy Industrial zone, which when combined create an environment that is less susceptible to signage related effects that a typical rural land holding.
- 6.9 As a consequence of this site context, I also consider the second part of the submitter's relief to be appropriate. The amount, height and areas for signage is less what is permitted within a GIZ, providing a degree of transition, and acknowledging the different character, while rules managing the safety of signs adjacent to the State Highway still apply.
- 6.10 **I agree with the submission in part and recommend the following amendments:**

SIGN-REQ1	Free Standing Signs	
GRUZ (excluding GRUZ PREC-1)	<p>8. There shall be a maximum of one free standing sign per site for sites 4ha or less in area.</p> <p>9. There shall be a maximum of three free standing signs per site for sites over 4ha in area. Signs shall be a minimum of 50m apart.</p> <p>10. The maximum area of a sign shall be 3m².</p> <p>11. The maximum height above ground level at the top of the sign shall be 6m.</p>	<p>Activity status when compliance not achieved:</p> <p>12. When compliance with any of SIGN-REQ1.8.-1.12. not achieved: RDIS</p> <p>Matters for discretion:</p> <p>13. The exercise of discretion in relation to SIGN-REQ1.13. is restricted to the following matters:</p> <p>b. SIGN-MAT1</p>

GRUZ PREC-1	14. <u>There shall be a maximum of two free standing signs per site. The maximum area of all signs shall be no more than 12m². The maximum height above ground level at the top of the sign shall be 6m.</u>	<p><u>Activity status when compliance not achieved:</u></p> <p>15. <u>When compliance with any of SIGN-REQ1.14 not achieved: RDIS</u></p> <p>-</p> <p><u>Matters for discretion:</u></p> <p>16. <u>The exercise of discretion in relation to SIGN-REQ1.16. is restricted to the following matters:</u></p> <p>b. <u>SIGN-MAT1</u></p>
----------------	---	---

6.11 **Recommendation to make changes to SIGN-REQ1 as above.**

6.12 A further submission was made by K&B Williams¹¹, which does not specify signage, but as part of the site design requested signage to be considered. The submission relates to zone provisions, access and layout that may affect the submitter's land on Marshs Road, which is situated adjacent to the west of proposed GRUZ-PREC1 on the opposite side of Shands Road.

6.13 Considering their submission regarding free-standing signage I refer to my previous discussion above. The submitters land is not only dissected by SH1, Shands Road also provides a physical boundary that will minimize effects from the precinct activities, including any visual impact from signage within the site.

6.14 **Recommendation to consider the submitters request when addressing other site layout matters.**

7. SUBMISSIONS ON SIGNAGE LIMITS OF FREE-STANDING SIGNS IN LFRZ, GIZ AND TCZ

7.1 The submission made by Woolworths New Zealand¹² relates to free-standing signs in the LFRZ and GIZ. The submitter seeks to amend SIGN-REQ1.15. to allow the maximum area of a sign to be 27m² instead of 18m².

7.2 A second submission point¹³ made by Woolworths New Zealand relates to free-standing signs in the TCZ. The submitter seeks to amend SIGN-REQ1.21. b. to allow the maximum area of a sign to be 27m².

7.3 The reasons for stipulating a maximum sign size stems from the objective to consolidate signage and avoid visual clutter. This is particularly relevant in high amenity environments, such as the district's town centres and the Town Centre Zones.

7.4 Consolidating advertisement to a single free-standing sign that advertises activities of several units for example, has numerous amenity and accessibility benefits. Grouped signage

¹¹ DPR-0157.FS022

¹² DPR-0396.027 Woolworths

¹³ DPR-0396.028 Woolworths

can also assist where the individual shop does not have a direct frontage. For this to be successful space for signage should be incorporated from the onset as part of an integrated design process, which will assist in achieving an outcome that is complementary and directive, while also in keeping with the intended overall character and function of the zone.

- 7.5 The submitter's relief in respect to signage size are a considerable increase to the current operative plan provision, which has been developed following a comprehensive baseline assessment and section 32 evaluation. While signage is an anticipated and necessary element of the town centre environment, the obvious benefits need to be balanced against the sensitive nature of some environments, which is why for example the proposed provisions are more permissive in GIZ and LFRZ and less so in TCZ Zones.
- 7.6 Whilst larger face areas for signage that relate to the activity, can be appropriate (or their affects absorbed) in large commercial or industrial areas, for the majority (except for I-ZONE and I-Port industrial hubs) in the Selwyn context, such areas are relatively small and are invariably located immediately to residential or rural areas¹⁴.
- 7.7 Having assessed the request by the submitter in the context of Selwyn and the individual zones, I conclude that the increase in height will have either a direct (in the case of the town centre) or indirect (in the case of GIZ) effect on maintaining the amenity values of the zone and potentially the receiving environment in the vicinity.
- 7.8 For the reasons outlined above, I consider that an increase in the area for signage will have negative effects on the amenity values of the receiving environment and potentially undermine the effectiveness of the Signs Chapter and PDP.
- 7.9 **Recommendation to decline the submitters request to increase the maximum free-standing sign area in TCZ, LRFZ and GIZ to 27m².**

8. SUBMISSION ON SIGNAGE ON BUILDINGS

- 8.1 The submission made by Rolleston Square Ltd.¹⁵ relates to all zones not otherwise specified. The submitter seeks that SIGN-TABLE1 is amended to allow for 40% of primary building façade to be used for signage. The submission also seeks to clarify that signage attached to windows does not count towards the allowance for signage.
- 8.2 SIGN-TABLE1 stipulates the total maximum area of signs per building and the maximum height above ground level at the top of the sign.
- 8.3 In response to the first part of the submission. Signage and the provision of active frontage can be interrelated, especially if applied to the front façade of a building, which is at the public/private interface and along areas that are highly frequented by pedestrians.

¹⁴ DW008- Signage final, Page 23, 2017

¹⁵ DPR-0386.003 Rolleston Square

- 8.4 The location of signage plays an important role depending on its function and the design of the building. Signage as part of commercial development is a complementary component to add, amongst other outcomes, design legibility and should be incorporated into the overall design of the building so that they complement the wider public space.
- 8.5 The Selwyn District Commercial Design Guide (SDCDG) encourages sign size, amount and placement to be carefully considered to achieve an outcome that is complementary, rather than overwhelming the streetscape and public realm.
- 8.6 Signs need to be in proportion to the size of the building. In summary, there is a need for the PDP to encourage and enable appropriate signage, while maintaining a level of amenity appropriate to the surroundings context.
- 8.7 Considering the above in the context of the submission, I agree with the submitter that using the length of buildings only for *“all zones not otherwise specified to establish the total maximum area of signs per building”* is not best practice and should be amended to take into account the height of the façade also.
- 8.8 While I agree with the approach of applying a percentage to the front façade to establish the maximum of signage attached to a building, I do not agree with the suggested amount of 40%. Having nearly half of the façade used for advertisement risks it dominating the exterior appearance of the building and contributing to visual clutter of displays. The amount of signage per façade should achieve an outcome where signage is a supporting, ancillary element to the primary activity occurring on site.
- 8.9 A quarter (25%) of the front façade is considered appropriate and achieves an outcome that enables signage, while simultaneously retaining sufficient wall space to incorporate window and door openings to achieve active frontages promote passive surveillance and incorporate CPTED principles along public spaces and areas that are frequented by pedestrians. These outcomes are supported by the SDCDG and existing rules in the Operative District Plan.¹⁶
- 8.10 **I recommend the following changes:**

SIGN-TABLE 1- Signs attached to Buildings:		
Zone	Total maximum area of signs per building	Maximum height above ground level at top of sign
All Zones not otherwise specified including KNOZ where not for education purposes	Building length along primary building frontage (m) x 1.5 = permitted area m ² <u>Signage does not occupy more than 25% of the primary building façade.</u>	Façade height

¹⁶ SDP-Rule 19.1.1.10

- 8.11 In regard to the second part of above submission, I refer to my response to submission DPR-0204.047 in the context of the CMUZ chapter. In this assessment, I have confirmed that active frontage can only be achieved if glazing within openings is transparent, unobstructed, and free of advertisement. Signage should therefore not be placed within the openings to achieve visual coherence and optimise passive surveillance along public areas. This complements the requirement to make provision for active frontages in the CMUZ chapter.
- 8.12 For above reasons I do not agree with the submitters request, which implies that signage attached to windows is an acceptable outcome and should not count towards the allowance for signage attached to buildings. In my opinion, this would conflict with the active frontage requirement rule of the PDP.
- 8.13 **Recommendation to decline the submitters request the SIGN-TABLE1 to be amended to allow for 40% of primary building façade to be used for signage.**
- 8.14 **Recommendation to amend SIGN-TABLE 1 for “All zones not otherwise specified including KNOZ where not for education purposes” as per 8.10.**
- 8.15 A further submission made by Waka Kotahi NZ Transport Agency¹⁷ seeks Council to consider the implications of the requested relief and how the number and size of signs attached to buildings will be appropriately managed to minimize adverse effects on the safety of road users.
- 8.16 I have considered the relief being sought and reiterate that safety and legibility have been balanced with the functional aspects of signage as there is a separate rule requirement to manage signage placed adjacent to strategic roads.
- 8.17 **Recommendation to acknowledge the submitters¹⁸ request.**
- 8.18 The submission from Woolworths New Zealand Ltd. ¹⁹ relates to signs attached to buildings in GIZ and LFRZ. The submitter seeks to exempt signs attached to buildings in the GIZ and LFRZ from parts of the requirements of Sign-REQ2 SIGN-TABLE1- Signs attached to buildings.
- 8.19 SIGN-TABLE1 stipulates that in all zones specified the total permitted m² area of signs attached to buildings to be calculated by measuring the building length along the primary building frontage in meters and take this measurement times 1.5.
- 8.20 In my opinion, above request would result in no maximum amount for signage attached to buildings and leave only the height of signage being managed within GIZ and LFRZ.
- 8.21 Whilst larger areas for signage that relate to the activity, can be appropriate (or their affects absorbed) in large commercial or industrial areas, for the majority (except for the I-Zone and I-Port industrial hubs) in the Selwyn context, such areas (including GIZ zones) are relatively

¹⁷ DPR-0384.FS204 Waka Kotahi

¹⁸ DPR-0375.FS204 Waka Kotahi

¹⁹ DPR-0396.029 Woolworths

small and are invariably located immediately to residential or rural areas²⁰. Due to the location and nature of LFRZ it is anticipated that customers will largely arrive by car, requiring car parks in proximity to buildings. Shoppers will be moving between these car parking areas and individual adjacent shops.

- 8.22 From an urban design perspective this translates into high volumes of pedestrian activity within 'de-facto' public spaces and the requirement to address safety and amenity, such as providing 'active frontage' along the front façade to promote passive surveillance between inside and outside the buildings. As discussed previously in my evidence (points 8.3 and 8.11) active frontage can only occur when there is a sufficient proportion of unobstructed glazing within the building facades along public or de facto public spaces.
- 8.23 Whilst the LFRZ's are less sensitive environments than for example the TCZ, having no regulation on the amount of signage could result in the worst case scenario of 100% of a building's front façade being used for signage, which would be contrary to best practice design and national CPTED principles.
- 8.24 Having assessed the request by the submitter, I conclude that removing the maximum area of signs prescribed to buildings within the GIZ and LFRZ will contribute to adverse effects, including on the amenity values of adjacent zones and the safety aspects of the receiving environment and its users.
- 8.25 **Recommendation to decline the submitter's²¹ request.**

9. SUBMISSION ON LED AND DIGITAL LIGHTING

- 9.1 The submission made by Go Media Ltd.²² relates to the PSDP in its entirety and particularly the Signs Chapter and associated definitions. There are three parts to the submission (DPR-0250.001, 002 and 003).
- 9.2 The submitter seeks the PDP is amended to: a) recognise the positive effects of digital advertising and enable this type of signage in the Selwyn District; b) treat off-site signage the same way as on-site signage; c) to have off-site related digital advertising as a separately listed permitted activity and where compliance cannot be achieved, a restricted discretionary activity status be applied; and d) that SIGN-REQ6 and SIGN-MAT2 to be deleted.
- 9.3 In response to the first submission point a), I acknowledge that there are beneficial aspects to digital advertising, such as increased visibility, signaling when a business is open and the ability for changing messages within a single area of sign that may relate to multiple activities.

²⁰ DW008- Signage final, Page 23, 2017

²¹ DPR-0396.029 Woolworths

²² DPR-0250.001, DPR-0250.002, DPR-0250.003 Go Media

- 9.4 **The PDP refers to LED or digital lighting indirectly in the note sign-overview that “Signs that are illuminated are subject to the Light Chapter.”**
- 9.5 **Recommendation to acknowledge the submitter’s first part of his/her request and amend the note to “are also subject to the Light Chapter.”**
- 9.6 In response to the submitters request b) to manage off-site signage the same as on-site signage, I consider that signs have various functions, the overarching one being to alert/highlight to an activity that is occurring in the immediate vicinity. Requiring that signs are placed on the same site as the activity also avoids the consequential clutter of multiple signage from activity on and off-site. For most signs, the objective is to have a visual relationship between the signage and the activity being advertised.
- 9.7 In some instances, for example when advertising for a number of premises/ activities on one billboard is required, removing this relation is a consequential aspect. In these cases, the effect should be addressed within a resource consent process taking into account the proposal in context of the site and the surrounds. Matters that need to be considered are variable depending on location and sensitivity of the receiving environment.
- 9.8 **Recommendation to decline the submitter’s request.**
- 9.9 In response to the last point of the submitter, requesting to delete Sign-REQ6 and Sign-MAT2, in point 9.3 I have acknowledged the benefits of digital signage. However, there are also negative effects that can be associated with digital advertisement, such as being a potential driver distraction. LED lights are brighter than other forms of signage, making them visually prominent, particularly at nighttime, which can become an amenity and nuisance issue in sensitive areas, such as residential neighbourhoods’ or rural areas.
- 9.10 Managing digital and lit signage within targeted locations has several positive outcomes, such as reducing light pollution at night, reducing the potential for disrupting natural patterns of wildlife, human sleep, but also supports Selwyn’s vision for retaining the district’s dark sky, which Selwyn is known for and has taken measures to protect including the establishing of a dark sky zone and an observatory zone in West Melton.
- 9.11 In Residential Zones even low levels of artificial light can cause significant loss of amenity to properties due to the residential nature of the area. Areas dominated by residential dwellings are particularly sensitive to the timing of light spill at night. This is relevant to both residences within the larger towns and in rural communities.
- 9.12 In Rural Zones there is an appreciation of the night sky due to current low levels of lighting and this should be protected.
- 9.13 The PDP in the Light chapter sets levels of light (measured in lux) to ensure that activities occurring within, and around dwelling houses are not distracted by glare.
- 9.14 This is supported in the baseline report and section 32 evaluation, which confirm that there is merit in acknowledging digital advertising, while at the same time retaining the need to

assess the any potentially adverse effects on the receiving environment. This is best be done within a resource consent process by assessing amenity related effects, such as the activity according to location, the hours of operation and the type of signage proposed, which are matters that are part of SIGN-MAT2.

9.15 Having assessed the request by the submitter in the context of Selwyn in general and also the individual zones in particular, I conclude that removing the Sign-REQ6 requirement and Sign- MAT2 for will have compromise the effectiveness of the PDP to maintain the amenity values for the respective zones, the receiving environment and its users.

9.16 **Recommendation to decline the submitter's request.**