

OOHMAA

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of hearing of a submission and further submission lodged by the **OUT OF HOME MEDIA ASSOCIATION OF NEW ZEALAND INC.** in respect of the 'Signs' Chapter and the 'Signs' Design Guide in the **Proposed Wellington City District Plan**

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**SUMMARY STATEMENT OF ANTHONY BLOMFIELD FOR  
OUT OF HOME MEDIA ASSOCIATION OF AOTEAROA ON THE PROPOSED  
WELLINGTON DISTRICT PLAN – HEARING 7**

**PLANNING**

**22 MARCH 2024**

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## **1. INTRODUCTION**

- 1.1 My name is Anthony James Blomfield. My qualifications and experience are set out in my primary statement of evidence on this topic, dated 5 March 2024.
- 1.2 I have read and considered the Statement of Supplementary Planning Evidence of Josh Patterson on behalf of Wellington City Council, dated 12 March 2024, which responds to my primary statement of evidence on behalf of the Out of Home Media Association of New Zealand (**OOHMAA**).
- 1.3 Mr Patterson agrees with my evidence in respect of the following matters:
- (a) An amendment to Policy SIGN-P1 to clarify the outcome that is sought in relation to visual clutter effects resulting from signage (addressed at paragraphs 4.1 to 4.12 of my evidence);
  - (b) A minor 'administrative' amendment to Rule SIGN-R5 to remove reference to compliance with Standard SIGN-S5 (as this standard relates to other forms of signage, and is not specifically relevant to 'digital signs' which are the focus of Rule SIGN-R5) (addressed at paragraphs 5.5 to 5.8 of my evidence);
  - (c) The deletion of Standards SIGN-S8(1)(e) and (f), which related to constraints on the use of 'contact details' and the number of characters displayed on digital signs (addressed at paragraphs 6.27 to 6.37 of my evidence); and
  - (d) An amendment to Standard SIGN-S8(2)(b) to provide for a 'dwell time' for digital signs of 8 seconds in 0-80 km/h road environments and 30 seconds in 80+ km/h road environments (addressed at paragraphs 6.38 to 6.46 of my evidence).
- 1.4 The remaining points of disagreement between myself and Mr Patterson are addressed below.

## **2. STANDARD SIGN-S1 (MAXIMUM AREA OF ANY SIGN)**

- 2.1 Mr Patterson disagrees with my recommendation to amend the maximum size of a sign in the Metropolitan Centre Zone from 5m<sup>2</sup> to 20m<sup>2</sup> to be consistent with the proposed standard for signs in the City Centre, Mixed Use and General Industrial Zones. Mr Patterson's reasons are that the

Metropolitan Centre are “more suburban in character and are characterized by residential land use both within and directly adjoining the zone”.

- 2.2 I disagree with Mr Patterson’s description of the Metropolitan Centres as “suburban in character”. The Metropolitan Centre Zone is described by the National Planning Standards 2019 as:

*“Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.”<sup>1</sup>*

- 2.3 The only difference between the Metropolitan Centre Zone and the City Centre Zone is that the City Centre Zone is described as being “...the main centre for the district or region”.<sup>2</sup>

- 2.4 This is in contrast to a suburban environment, which is described as being characterised by the Low Density Residential Zone which is:

*“...consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.”<sup>3</sup>*

- 2.5 Further, Policy 3(b) of the National Policy Statement on Urban Development 2020 requires that Metropolitan Centre Zones enable:

*“...building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys.”<sup>4</sup>*

[Emphasis added.]

- 2.6 I maintain my opinion that a 20m<sup>2</sup> maximum size for signs in the Metropolitan Centre zone is appropriate because:

- (a) The Metropolitan Centre Zone is described as “a focal point for sub-regional urban catchments” which “provides significant support to the City Centre Zone by offering key services to the outer suburbs of Wellington City and the wider region”, providing for a mix of compatible activities, including residential, commercial and non-heavy industrial

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<sup>1</sup> National Planning Standards November 2019, Table 13 at page 37.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> National Policy Statement on Urban Development 2020, updated May 2022, at page 11.

activities. This is also the case in the City Centre and Mixed Use Zones, where signs are provided for up to 20m<sup>2</sup>.

- (b) The Metropolitan Centres are not anticipated to be “suburban” in character. The outcomes enabled in the zone support flexible standards for signage. The Metropolitan Centre Zone anticipates and enables significant development and redevelopment in order to accommodate growth, enabling development of a significant scale (between 15m and 42m) that is generally taller than the scale of development enabled within the Mixed Use and General Industrial Zones.
- (c) The adjacency of Metropolitan Centre Zone to residential areas (of varying scales and characters) is no different to the City Centre, Mixed Use and General Industrial Zones.
- (d) Relative to these outcomes, there is no characteristic of the Metropolitan Centre Zone that distinguishes it from other zones in which signs are enabled up to 20m<sup>2</sup> in area.

### **3. STANDARD SIGN-S4 (MAXIMUM HEIGHT OF FREESTANDING SIGNS)**

- 3.1 Mr Patterson disagrees with my recommendation to amend the maximum height of freestanding signs in the Metropolitan Centre, City Centre and Mixed Use zones from 4m to 8m, because a 4m standard “*will ensure that signs are not overly dominant within these environments*”.
- 3.2 As it relates to Metropolitan Centre Zones, Mr Patterson’s reasoning appears to be based on his opinion that Metropolitan Centres are “*suburban in character*”. I have set out above why this is incorrect.
- 3.3 It is not clear to me why Mr Patterson considers that signs over 4m in height would be overly dominant in any of these zones. In that regard, the provisions for the zones enable:
  - (a) In the City Centre Zone, buildings with a minimum height of 22m and up to significantly greater heights;
  - (b) In the Metropolitan Centre Zone, buildings with a minimum height of 7m and a maximum height of between 15m and 42m; and

(c) In the Mixed Use Zone, buildings up to a maximum height of between 12m and 18m, and up to 27m in particular parts of the zone (as a restricted discretionary activity).

3.4 The enabled scale of the built environments within these zones is significant. In my opinion, freestanding signs up to 8m in height will not appear “overly dominant” in this context, and I do not agree that a 4m height limit is required within these environments.

3.5 I maintain my opinion that an 8m maximum height standard is appropriate within these zones, because:

(a) Signs taller than 4m are common within these zones, and are compatible with the outcomes that are sought by the zones.

(b) These zones enable development of a scale that is greater than 8m. The potential dominance effects of free-standing signs will be proportionate to the scale and form of the built environment within these zones.

(c) A standard that constrains the height of free-standing signs to 4m will be inefficient, and will result in unnecessary or overly complex resource consent processes.

#### **4. PROVISIONS RELATING TO SIGNS THAT ARE VISIBLE FROM A STATE HIGHWAY**

4.1 Mr Patterson disagrees with the changes that I have recommended to remove specific constraints on signs that are visible from a State Highway with a speed limit of less than 80 km/h, primarily because:

*“...given the importance of the state highway network to the region and the high volume of traffic which uses the state highway each date, it is necessary to specify that digital signs are not oriented to be read from the state highway”.*

4.2 The only expert transport evidence that addresses the Signs chapter is from Mr Brett Harries. Neither the Council nor Waka Kotahi have provided any expert evidence that would support the constraints that are proposed on signs that are visible from State Highways with a speed limit less than 80 km/h. Mr Patterson’s position is not supported by any technical transport expert.

- 4.3 In preparing my primary statement of evidence, I have relied on the expert evidence of Mr Harries, which confirms that there is no practical difference between State Highways with speed limits less than 80 km/h and other major arterial roads.
- 4.4 On the basis of Mr Harries' expert evidence, and the absence of any other expert transportation evidence to the contrary, I maintain my opinion that it is not efficient, effective or appropriate from a planning perspective for the district plan to contain provisions which constrain signs that are visible from State Highways with a speed limit of less than 80 km/h. The potential effects of such signs are suitably managed by the same provisions that apply to signs visible from Council operated roads.
- 4.5 I accept that such provisions are appropriate for signs that are visible from State Highways with a speed limit of 80 km/h or more.
- 4.6 I further note that in his supplementary evidence (in response to the evidence for another submitter), Mr Patterson has referred to the 'Third party signs on and visible from the state highway corridor Planning Policy Manual' published by Waka Kotahi on 28 November 2023. Mr Patterson explains that the Signs Chapter has been "drafted to be consistent as much as possible" with this document. Given the Proposed District Plan was notified 15 months before the Waka Kotahi manual was published, and the document is not referred to in the s 42A Report prepared by Mr Patterson, it is not clear to me how this is the case.
- 4.7 The authors of the Planning Policy Manual are planners, and there has been no technical evidence (including from a traffic expert) on behalf of Waka Kotahi which otherwise explains the status of the Planning Policy Manual. In this respect, I maintain my position which is informed by the (unchallenged) expert traffic evidence by Mr Harries.