

Te Tai o Poutini Plan Proposed Plan Submission form

**Have
your
say!**

Te Tai o
Poutini Plan
Proposed
Plan

We need your feedback. We want to hear from you on the proposed Te Tai o Poutini Plan. What do you support and what would you like changed? And why? It is just as important to understand what you like in the Proposed Plan as what you don't. Understanding everyone's perspectives is essential for developing a balanced plan.

Your details:

First name: **Frank**

Surname: **Costello**

Are you submitting as an individual, or on behalf of an organisation?

Individual

Organisation

Organisation (if applicable): **Go Media Limited**

Would you gain an advantage in trade competition through this submission?

Yes

No

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am /am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

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Email: **fande2000@gmail.com
and alex.booker@al.nz**

Phone: **027 229 4116, 0276562647**

Signature: *A Booker*

Date: **10 November 2022**

Your submission:

The specific provisions of the proposal that my submission relates to are:

Strategic Direction

Energy Infrastructure and Transport

Hazards and Risks

Historical and Cultural Values

Natural Environment Values

Subdivision

General District Wide Matters

Zones

Schedules

Appendices

General feedback

All submitters have the opportunity to present their feedback to Commissioners during the hearings process. Hearings are anticipated to be held in the middle of 2023. Please indicate your preferred option below:

I wish to speak to my submission

I do not wish to speak to my submission

If others make a similar submission, would you consider presenting a joint case with them at a hearing?

Yes, I would consider presenting a joint case

No, I would not consider presenting a joint case

Public information - all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published to the Te Tai o Poutini Plan website and available to the public. It is your responsibility to ensure that your submission does not include any personal information that you do not want published.

Want to know more?
tppp.westcoast.govt.nz

0508 800 118



**Te Tai o Poutini
PLAN**

A combined district plan for the West Coast

Submission on notified proposal for Proposed Te Tai o Poutini Plan

- 1 This is a submission on the Proposed Te Tai o Poutini Plan (**TTPP**) by Go Media Limited (**Go Media**).
- 2 Go Media does not support the Signage chapter or the other provisions relating to signs in the TTPP in its current form.
- 3 Go Media's submission is that billboards (including digital billboards) and non-site related advertising should be explicitly enabled in the TTPP provisions and in appropriate zones (commercial, industrial and port zones) through an activity specific rule and subject to appropriate industry standards.
- 4 Advertising, including off-site signage, contributes to the commercial vitality of a community through supporting business, infrastructure and community activities. It is a legitimate commercial activity that generates economic activity by enabling the commercial community to advertise goods and services. Advertising can enhance the character of areas, buildings and structures also provides a focal point and adds vibrancy and interest. These positive effects should be expressly recognised in the TTPP. Go Media supports SIGN-O1(1), but SIGN-O1 (2) requires amendments to delete reference to *"and protected from any adverse visual and amenity effects"*.
- 5 Digital advertising can have a broader purpose and significantly less visual impact when compared with on-site advertising due to the flexibility digital advertising provides. Digital advertising also allows for some advertising to be site related. Any potential adverse effects from non-site related advertising in relation to traffic safety, landscape and amenity values can be managed through location and appropriate built form standards. Environmental effects assessments done for Go Media's existing static and digital billboards nationwide have demonstrated that effects are acceptable. These assessments were supported by technical traffic and urban design analysis where required.
- 6 Go Media is also concerned with:
 - (a) the lack of provision for off-site advertising in the policies and rules (SIGN-P5, SIGN-R17 1);
 - (b) the onerous size provisions (10% of a wall or 3m² whichever is the lesser (spelt wrongly in the plan as Lessor) (SIGN-R7, SIGN-R17 3);
 - (c) restrictive word count - 6 words and 40 characters facing a road (SIGN-R1 10(iii));
 - (d) restrictive spacing between signs, in the township and industrial areas it would mean only every second or third property would be able to have a sign (SIGN-R1 11 (i)); and

- (e) any third party sign falls straight to restricted discretionary (SIGN-R17 1).
- 7 The Section 32 Report fails to provide an adequate planning assessment to support the proposed signage chapter.
- 8 If off-site signage is expressly provided for as requested it is Go Media's submission that the TTPP would achieve the requirements of the RMA, including:
- (a) achieving the integrated management of the effects of use and development of land and associated natural and physical resources of the districts as required by section 31 of the RMA;
 - (b) meeting the requirements of section 32 of the RMA, in that the amended policies and rules would be the most appropriate method for achieving the RMA's purpose and are the most efficient and effective means for achieving the District Plan's objectives;
 - (c) assisting the Council to carry out its statutory functions in order to achieve the purpose of the RMA; and
 - (d) promoting the sustainable management of natural and physical resources in accordance with Part 2 of the RMA.

Decision Sought

- 9 Go Media seek the following decision from the Council:
- (a) That billboards (including digital billboards) and non-site related advertising be explicitly enabled in the TTPP provisions;
- That billboards (including digital billboards) and non-site related advertising be explicitly enabled in appropriate zones (such as commercial, industrial and port zones) through an activity specific permitted activity rule supported by recognised industry standards;
- (b) that the provisions in the Proposed Plan be amended to address issues raised in this submission; and
 - (c) such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies, rules and definitions of the District Plan that address the matters raised by Go Media.

Dated this 10th day of November 2022

Frank Costello
Consultant, Go Media Limited

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