

**NOTICE OF FURTHER SUBMISSION BY THE NZ TRANSPORT AGENCY TO PROPOSED PLAN
CHANGE 45 TO THE UPPER HUTT DISTRICT PLAN PURSUANT TO CLAUSE 8 OF THE FIRST
SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

To: Richard Harbord
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Via email: planning@uhcc.govt.nz

**Submitter/
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1. The NZ Transport Agency's specific further submission points are as contained in the attached Table.
2. The NZ Transport Agency's interest in the proposed plan is greater than the interest of the general public.
3. The NZ Transport Agency's wish to be heard in support of this further submission.
4. If others make similar submissions, the NZ Transport Agency's would be prepared to consider presenting a joint case with them at any hearing.

Dated at Wellington this 25th day of October 2018



Aaron Hudson
Acting Senior Planner
NZ Transport Agency
Authorised to sign on behalf of the NZ Transport Agency pursuant to a delegation from the Chief Executive.

Submission	Relief Sought By Submitter	Position of the NZ Transport Agency	Reason for Support/Opposition
<p>2.6 Allison Tindale</p>	<p>The submitter seeks to broaden the application of Policy 8A.3.3.3(d) to recognise that the policy should not be limited to just protecting residential amenity. The submitter's primary submission submits that Policy 8A.3.3.3(d) should also seek to manage the effects of moving, digital or changing signage on street scene and amenity across all zones.</p> <p>Relief sought by submitter:</p> <p>Subsection (d) the word 'residential' is deleted: <i>manages any moving, digital or changing signage, and illuminated signage to protect residential amenity and to not compromise the safety of road users;</i> and</p> <p>Relief also sought by the submitter:</p> <p>8A.3.3.3(e) Relocate the matters of consideration for resource consent for signs which are not site on the site to which they relate out of the policy section and into the rules section of the plan.</p> <p>The following policy wording is suggested: limit signs which are not situated on the site to which they relate, except where,</p> <ul style="list-style-type: none"> - there is a need for off-site signage; and - the design and location of signs contributes to the maintenance of the character and amenity of the surrounding area - and when considering proposals for such signs have regard to the following: <ul style="list-style-type: none"> (i) The need for the sign to be located away from the site, including any constraints relating to the location of the businesses, which creates a need for off-site signage, and (ii) The capacity for the site and surrounding environment to accommodate the sign, and for the character and amenity values to be maintained; and (iii) Any adverse effects on transport safety or efficiency, or transport benefits in providing for the sign to be located away from the site. 	<p>Support</p>	<p>The Transport Agency supports the submitter's primary submission that seeks to broaden the application of Policy 8A.3.3.3(d). The Transport Agency agrees that moving, digital or changing signage can affect amenity for all zones.</p> <p>The Transport Agency seeks for Council to amend Policy 8A.3.3.3(d) as per the submitter's primary submission.</p> <p>The submitter also seeks to amend Policy 8A.3.3.3(e) to relocate the matters of discretion from the policy section of Proposed Plan Change 45 to the matters of discretion section. The Transport Agency supports this recommendation as for plan users it will provide greater clarity. It is also good planning practice to bundle matters for discretion within a district plan where they can readily be found.</p>
<p>2.7 Allison Tindale</p>	<p>Policy 8A.3.3.4 Relief Sought: Minor changes of wording to:</p> <p>9(b) <i>Provide for the consideration of temporary signs of longer than two months a larger duration or above (3m2) in size through the resource consent process, where amenity values are maintained and the safety of road users is not compromised.</i></p>	<p>Support</p>	<p>The Transport Agency supports the relief sought by the submitter in their primary submission. This is because the recommended relief provides greater clarity for plan users.</p>
<p>2.10 Allison Tindale</p>	<p>Permitted Activities 8A.3.4.9 Relief Sought: Standard for Permitted Activities 8A.3.4.9(b) to be amended as follows: Signs in Residential and Rural Zones are permitted activities for:</p> <p><i>(b) A maximum of three signs per site, where the principle use of the site is non-residential</i></p>	<p>Oppose</p>	<p>The Transport Agency is concerned that the relief sought will encourage proliferation of signage. Poorly designed and located signage can confuse and/or distract drivers. Too many signs can also reduce the effectiveness of official road signs. This is because driver's become overloaded with seeing too many signs resulting in official signage being overlooked or ignored.</p>

Submission	Relief Sought By Submitter	Position of the NZ Transport Agency	Reason for Support/Opposition
2.13 Allison Tindale	<p>Permitted Activities 8A.3.4.13 – Traffic safety – All signs</p> <p>The submitter has no objection to the content of the standards, but finds they generally apply to signs in road corridors/verges.</p> <p>Relief sought: The heading be changed to ‘standards for signs in road corridors’. That one or more of these provisions also needs to apply on private land (such as height clearances for signs be</p>	Oppose	<p>The Transport Agency notes that the wording of Permitted Activities 8A.3.4.13 as drafted applies to all signs facing the road whether located inside or outside of the road corridor. It is our concern that the relief sought will remove the ability for Council to assess the effects on signage on the safe and efficient operation of both local roads and state highways.</p> <p>The Transport Agency takes care when assessing proposals to erect non official traffic signs that face a state highway. This is to ensure signs facing a state highway are appropriately designed and located to minimise driver distraction and/or proliferation. The Transport Agency therefore seeks for Council to retain the wording as drafted to enable the assessment of signage to ensure road safety is not adversely affected.</p>
3.3 Oil Companies	<p>The submitter supports Rule 8A.3.4.7 as drafted and seeks for Council to retain it without amendment.</p>	Support	<p>The Transport Agency supports Rule 8A.3.4.7 and the Oil Companies’ primary submission point 3.3. This is because the Transport Agency discourages signage which is located on a site that it does not relate to. Remote signage can lead to proliferation of advertising signage. Proliferation of signage can reduce the effectiveness of official traffic signs as too much signage overloads a driver’s ability to absorb key official signage.</p>
3.11 Oil Companies	<p>However, they seek to amend (f)(iii) to clarify that the intent of clause (iii) is to ensure the placement of signage does not obstruct motorists’ view of the road</p> <p>The submitter supports in part Rule 8A.3.4.13(f) (iii) and seeks the following amendment in an attempt clarify the intent of the rule.</p>	Oppose	<p>The Transport Agency opposes primary submission 3.11. The rule as drafted protects the sightlines for motorists both along road and for driveways. If the rule is amended as sought by the Oil Companies, the Transport Agency is concerned that signage (for example pylons signs) could therefore be erected where it obstructs the view of driver’s entering or exiting a driveway. On narrow driveways this may lead to a collision.</p> <p>The Transport Agency seeks for Council to retain Rule 8A.3.4.13(f) as drafted.</p>
4.4 Powerco Limited	<p>Relief sought: Add the following definition Health and Safety Sign:</p> <p><u>A sign affixed to a network utility, or any other asset or structure for the purpose of providing a health and safety warning, identification or as a requirement of other legislation.</u></p> <p>Or, revised wording of this definition which achieves the same outcome.</p>	Support	<p>Plan Change 45 as drafted does not include a definition for a “Health and Safety Sign”. This may lead to confusion over what meets the criteria to be a permitted activity under rule 8A.3.4.1. Consequently this prompted the NZ Transport Agency to oppose the erection of “Health and Safety Signs” as a permitted activity within its primary submission.</p> <p>The Transport Agency supports Powerco Limited’s relief sought as this clarifies and provides a definition for “Health and Safety Signs” for plan users. The Transport Agency seeks for Council to adopt the recommended (or similar) relief.</p>