

**Appendix A – Statement of Evidence of Matthew Thode
Proposed Plan Change 45 To The Upper Hutt District Plan
Position Statement on Submissions and Further Submissions of the Oil Companies**

Submission / Further Submissions	Submission of the Oil Companies	Section 42A Report	Response of the Oil Companies <i>Changes from the text of the Plan Change as it was when proposed are shown as additions underlined and deletions in strikethrough</i>
Submission 3.5 Definition of Sign	Support the definition, except to the extent that it is exceptionally broad and could be read to include any face of a building or structure that is painted in recognisably “corporate colours” and also any sign necessary for traffic direction or instruction within a site. The submission also sought to ensure that the test of “visibility” from outside the site was not too restrictive: and considered that the test should relate to whether the signage is directed to and clearly legible to people outside the side.	Accept in Part – Para 33, Page 9. The intention of the sign definition is not to capture buildings painted in a corporate colour, and amendments are required to recognise this. The phrase “directed to and legible to a person” is unclear and should not be included.	Accept the recommendation in the Section 42A Report and amend the definition of sign as follows: <i>Sign: Means any device or facility, graphics or display that is visible from outside the site, for the purposes of: identification of, or provision of information about any building, activity, site; providing directions; or promoting goods, services or events. Signage may be part of, attached, or projected onto any building, site, or structure, or other object. Any sign may be illuminated and may contain moving content, including changing content and digital signage. <u>A building or structure that is painted in corporate colours does not, of itself, constitute signage.</u></i> The recommendation in the Section 42A Report is consistent with the intent of the Oil Companies submission.
Submission 3.2 Objective 8A.3.2.1	Support objective 8A.3.2.1 which recognises the potential adverse effects of signage on amenity values and the safety and efficiency of the land transport network, whilst appropriately recognising the benefits signage provides to communities and businesses.	Accept in Part (inferred, as no specific reference to this submission point) – Para 42, Page 10 Two modifications are proposed in response to submissions by others for the following reasons: <ul style="list-style-type: none"> • Adding reference to network utility operators within the objective is supported as it is relevant to this sector. 	Accept the recommendation in the Section 42A Report and retain objective 8A.3.2.1 albeit with two modifications as follows: ... <i>(a) supports the needs of the community, <u>network utility operators and businesses, to identify and advertise businesses and activities; and</u> ...</i> <i>(b) maintains the local character and amenity values, <u>while ensuring</u> and the safe and efficient functioning of the transport network</i>

		<ul style="list-style-type: none"> The addition of “while ensuring” does not alter the purpose and retains the balance of the overall intent of the objective and therefore is supported. 	The recommendation in the Section 42A Report is consistent with the intent of the Oil Companies submission.
Submission 3.2 Policy 8A.3.3.1	Support policy 8A.3.3.1 which recognises that the placement of signs can have adverse effects on zones that are generally considered more sensitive to amenity effects, and therefore seeks to manage new signage in these zones.	Accept (inferred, as no submissions sought otherwise) – Para 43, Page 10	<p>Accept the recommendation in the Section 42A Report and retain policy 8A.3.3.1 without modification, as follows:</p> <p><i>Manage the number, size and design of signs in the Open Space Zones, Rural Zones, and Residential Zones to maintain the character and amenity values of these zones.</i></p> <p>The recommendation in the Section 42A Report is consistent with the intent of the Oil Companies submission.</p>
Submission 3.6 Policy 8A.3.3.2	Retain Policy 8A.3.3.2 subject to an amendment to clarify how, and to what degree, the ‘ <i>amenity value of the adjoining residential zone</i> ’ might be adversely affected (or alternatively protected).	<p>Reject – Para 46, Page 11</p> <p>It is not considered necessary to amend the policy to define the scope of matters given the submission point is addressed via the proposed rule framework and because:</p> <ul style="list-style-type: none"> The rule framework provides for a permitted level of signs on Business and Special Activity Zone land without the need for resource consent, which sets a permitted baseline for a range of signage including freestanding signs, signs on buildings, and the direction of traffic such that visibility of the sign alone is not the starting point for assessment; and Signs that fail to meet the permitted standards are elevated to Restricted 	<p>Accept the recommendation in the Section 42A Report and retain Policy 8A.3.3.2.</p> <p>The intent of the Oil Companies submission is partially met, and the Oil Companies accept the analysis in the Section 42A Report, that the “adjoining residential zone” will be given some context by the acceptance of other submissions which require restricted discretionary activity consent for signs within 10m of a residential zone boundary.</p>

		Discretionary Activity status under Rule 8A.3.4.5. The matters of discretion relevant to this Rule are identified at 8A.3.4.14 in which (f) specifically addresses the circumstances on how signage may impact residential amenity through “...location, design or proximity...”.	
Submission 3.7 Policy 8A.3.3.3 (b)	Retain Policy 8A.3.3.3(b) subject to an amendment to acknowledge that the erection of signage will alter the visual amenity and character of a site, but that any such change should not detract from the character and amenity of the site and surrounding area.	Reject – Para 57, Page 12 It is not considered necessary to amend Policy 8A.3.3.3(b) because: <ul style="list-style-type: none"> • The use of the term “maintains” is in reference to the surrounding context and therefore is not unduly restrictive or inflexible as would be the case with use of stronger avoidance terms such as ‘prevent’ or ‘protect’. • The rule framework provides a permitted baseline for comparison so that the requested amendment would be unnecessary and could result in lowering the intent of the policy. 	Reject the recommendation in the Section 42A Report and amend Policy 8A.3.3.3(b) as sought in evidence. Refer evidence.
Further Submission Proposed Policy 8A.3.3.3	The Oil Companies opposed requested amendments to Policy 8A.3.3.3 by Alison Tindale (submission 2.6) on the basis that: <ul style="list-style-type: none"> • Clause (d) specifically addresses the protection of residential amenity due to the sensitive nature of this activity. Deletion of “residential” from Clause (d) would unnecessarily broaden that policy to apply to 	Accept the further submission and reject the primary submission - Para 54, Page 12 It is not considered appropriate to make the changes sought by the primary submitter because: <ul style="list-style-type: none"> • Removing “residential” broadens the scope of the policy to include highly sensitive and less sensitive zones / activities, when the policy is specifically referring to residential (as sensitive) 	Accept the recommendation in the Section 42A Report and retain policy 8A.3.3.1 without modification. The reasons for the recommendation in the Section 42A Report are consistent with those of the Oil Companies in the further submission.

	<p>business and industrial zones which is inappropriate as those activities are less sensitive, a lower standard of amenity is generally acceptable in those zones and they are already addressed by clause (b), which provides for the maintenance of the broader character and visual amenity of the site and surrounding area;</p> <ul style="list-style-type: none"> Shifting (i) and (iii) of Proposed Policy 8A.3.3.3 (e) would only be appropriate if the status of Rule 8A.3.4.7 was a Restricted Discretionary Activity (rather than a Discretionary Activity) – which it is not. 	<p>activities. To make the change would therefore remove the clarity and intent of the policy;</p> <ul style="list-style-type: none"> The change sought to (i) and (iii) is inappropriate for a full discretionary activity. These clauses need to be retained here in order to be properly considered. To do otherwise would reduce the clarity of the policy level direction. 	
Submission 3.3 Rule 8A.3.4.1	Retain Rule 8A.3.4.1 permitted activity rule for health and safety signage without any associated performance standards.	Accept – Para 37, Page 10 Accept in Part / Accept / Accept the further submission and reject the primary submission of NZTA – Para 78, Page 15	Accept the recommendation in the Section 42A Report and: 1. Retain Rule 8A.3.4.1 without modification as follows: <i>Any health and safety sign = Permitted</i>
Further Submission Rule 8A.3.4.1	The Oil Companies opposed a submission by New Zealand Transport Limited (“NZTA”) (submission 6.5) that sought to amend Rule 8A.3.4.1 to ensure all health and safety signage visible from State Highway 2 be permitted only where the sign complies with permitted performance standards 8A.3.4.8 to 8A.3.4.13. The Oil Companies stated that if permitted health and safety signage is restricted to that required by law, then it follows that such the signage is more likely than not reasonably located and designed. Also that Health and safety	Rule 8A.3.4.1 permits any health and safety sign. The insertion of a definition for a Health and Safety Sign is supported as it would provide clarity on the purpose and scope of the permitted provision. The absence of a definition or any permitted activity standards to support Rule 8A.3.4.1 leaves this provision open to interpretation and would result in uncertainty for both plan users and administrators when attempting to apply the provisions. To support this new definition, clarification that a health and	2. Include a new definition of Health and Safety Sign as follows: <u><i>Health and Safety Sign: A sign affixed to a structure or building for the sole purpose of providing a health and safety warning or identifying hazardous substances that is required by legislation or the regulations made under those Acts. This includes but is not limited to the Health and Safety at Work Act 2015 and the Hazardous Substances and New Organisms Act 1996. A health and safety sign excludes any additional advertising or content not required by the relevant legislation (which would be assessed as a ‘sign’ and those provisions would apply) and is not directly illuminated, digital or contains changing content.</i></u>

	signage is generally directed to persons within a site, to ensure for their health and safety.	safety sign cannot contain any other advertising or branding to avoid duplication or crossover with the temporary and permanent sign provisions is required, as is the addition of a sentence to the “sign” definition to expressly excluding “health and safety signs”.	3. Do not require health and safety signs to meet the permitted activity standards 8A.3.4.9 to 8A.3.4.13.
Rule 8A.3.4 (b) Exemptions	Delete exemption (b) insofar as signage indicating hazardous substances used at a hazardous facility is considered to already be a permitted activity pursuant to the exemption in Rule 8A.3.4(b). If necessary, include a new definition of “health and safety” sign which includes any signs required by legislation.	Exemption (b) should be deleted. It would become largely unnecessary and could be adequately captured by the rule permitting health and safety signage. The current exemption clause could therefore be deleted as hazardous signage would fall within the scope of the HSNO requirements.	4. Delete exemption (b) under Table 8A.3.4 as a consequence of inserting the ‘health and safety sign’ definition and instead add the following exemption clause (into (b)); <i><u>o Signs indicating hazardous substances used at a hazardous facility. The permitted activity standards 8A.3.4.8 to 8A.3.4.13 do not apply to Health and Safety Signs under Rule 8A.3.4.1.</u></i>
Submission 3.8 New definition of health and safety sign	Insert a new definition for a ‘Health and Safety Sign’ to provide clarity on what meets the criteria for a permitted activity under Rule 8A.3.4.1.	There is no need for health and safety signs to meet the performance standards as this could elevate them to require resource consent (under Rule 8A.3.4.5) when they are legally required. The addition of an exemption under the Table 8A.3.4 can clarify this.	5. Add the following to the definition for “Signs”; <i><u>This definition excludes ‘Health and Safety’ signs.</u></i> The recommendations in the Section 42A Report are consistent with the intent of the Oil Companies submission.
Further Submission New definition of health and safety sign	The Oil Companies supported a request by Powerco (submission 4.4) to add a definition for “Health and Safety Sign”, to provide clarity for what meets the criteria for a permitted activity under Rule 8A.3.4.1.		
Submission 3.3. Rule 8A.3.4.3	Supported the Restricted Discretionary Activity status of illuminated signs in Residential and Rural Zones.	Accept (inferred, as no submissions sought otherwise) - Para 93, Page 18	Accept the recommendation in part in the Section 42A Report, noting that the status of illuminated signs in Residential, Rural (and Open Space) zones remains restricted discretionary although a range of changes to the rules are recommended to: <ul style="list-style-type: none"> • Clarify that illuminated signs in Residential, Rural (and Open Space) zones are restricted discretionary irrespective of whether they are internally or externally illuminated and the addition of the following matter of discretion: <i><u>including any effects of illumination or glare; and</u></i> • Clarify that illuminated signs in the Business Commercial, Business Industrial and Special Activity

			<p>zones that are within 10m of a residential zone boundary require restricted discretionary activity consent.</p> <p>The recommendations in the Section 42A Report are consistent with the intent of the Oil Companies submission, insofar as:</p> <ul style="list-style-type: none"> • It is the illuminated sign itself that must be within 10m of the residential zone boundary – not the site upon which the sign is located; and • The existing matters of discretion for signs in Business Commercial, Business Industrial and Special Activity zones are adequate to address the intent of the addition. <p>However, the matter of discretion to be added to the Residential, Rural (and Open Space) is considered to be too broad and should be amended to read as follow: <i>Including any effects of illumination or glare <u>on adjoining residential properties.</u></i>"</p> <p>This is more specifically targeted to address the intent of the change in the rule (illumination within 10m of an adjoining residential zone). The inclusion of a broader matter of discretion is opposed because it infers a much wider retention of discretion than can be attributed to the change proposed.</p>
Rule 8A.3.4.5	Support a restricted discretionary status for signs (other than temporary signs) which do not comply with one or more of the permitted activity standards.	There does not appear to be a specific recommendation in respect of this submission point, however it is clear from the S42A Report that the status of signs other than temporary signs) which do not comply with one or more of the permitted activity standards will remain restricted discretionary.	<p>Make a specific recommendation to retain Rule 8A.3.4.5 without modification, as follows:</p> <p><i>Any sign (other than a temporary sign) which does not comply with one or more of the permitted standards at 8A.3.4.9 – 8A.3.4.13</i></p> <p>Making such a recommendation would be consistent with the intent of the Oil Companies submission.</p>

<p>Further Submission</p> <p>Rule 8A.3.4.6</p>	<p>NZTA seeks addition of standards to apply to all signs to control luminance and animation of digital signage where visible from a state highway or road in the interests of traffic safety and also so there is guidance on what is appropriate (which is based on the NZTA guidance manual for advertising signs).</p> <p>The Oil Companies opposed a request by NZTA (submission 6.10) to include two and extensive new rules relating to temporary signs and signs visible from roads, and to also include a number of additional (“good practice”) standards for illuminated signage. The Oil Companies opposed the inclusion of the standards because:</p> <ul style="list-style-type: none"> • The justification for the changes was that they would control digital signs, however the changes sought did not seem to only apply to that part of a sign which is digital but to the sign itself. <p>The Oil Companies sought that if the standards were to be included, they should only be applied to that part of a sign that is digital (i.e.: at a service station, the pricing component of the prime sign might be subject to the standard, but the balance of the prime sign should not be restricted by the standards relating to digital signage).</p>	<p>Accept the primary submission of NZTA relating to digital signage, but also accept the further submission of the Oil Companies and accept the submission of NZTA - Para 104, Page 20 and Para 107, Page 21</p> <p>Afford digital signs a Restricted Discretionary Activity status where the matters of discretion can be identified and a matter of discretion in relation to illumination could be added to guide the assessment.</p> <p>Notwithstanding that, acknowledging that the purpose of the rule is to manage the effects of the digital element of the sign, and noting that it will be that component that is assessed with respect to the impact of the digital element of the sign and that the non-digital components of the sign will be subject to the relevant permitted standards, to avoid confusion an ‘Advice Note’ should be added below table 8A.3.4 to clarify only the ‘digital’ elements of the sign will be assessed for purposes of Rule 8A.3.4.6.</p>	<p>Accept the recommendation in part in the Section 42A Report to:</p> <ul style="list-style-type: none"> • Make any digital sign or sign with moving or changing content restricted discretionary; • Add the following matters for discretion: <ul style="list-style-type: none"> (i) <u>The illumination effect from digital signs or glare resulting in distraction to road users</u> (ii) <u>The potential for obstruction, confusion or distraction in the observance of traffic directions, controls or conditions; and</u> (iii) <u>The potential for obstruction to sightlines to intersections, corners, bends in roads and vehicle and pedestrian entrances.</u> <p>However, while the proposed recommendation (para 107) that only the ‘digital’ elements of the sign will be assessed for purposes of Rule 8A.3.4.6 should be accepted, the ‘implementation’ recommendation to add an advice note below table 8A.3.4 [<u>“For the purposes of Rule 8A.3.4.6, only the digital components of the sign will be subject to the rule.”</u>] does not give effect to the intent of the oil Companies submission and should be rejected.</p> <p>A number of consequential (“tidy up”) changes are also required.</p> <p>Refer evidence.</p>
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<p>Submission 3.3 Rule 8A.3.4.7</p>	<p>Supported discretionary activity status for a sign (other than a temporary sign) which is not situated on a site to which the sign relates.</p>	<p>Accept the submission - Para 110, Page 21</p>	<p>Accept the recommendation in the Section 42A Report to retain discretionary activity rule 8A.3.4.7 as follows: <i>Any sign (other than a temporary sign) which is not situated on a site to which the sign relates</i></p> <p>Making such a recommendation would be consistent with the intent of the Oil Companies submission.</p> <p>However, as a result of another submission, the S42A Report recommends amending Rule 8A.3.4.11(h) Signs on buildings and other structures in Business Commercial Zones, Business Industrial and Special Activity Zones to require that these must <i>(iii) be situated on the site to which the sign relates</i>; It is not necessary to include that standard as proposed. The standard is a standard relating to signs, other than temporary signs, and which are permitted activities, however as any such sign is automatically discretionary (Rule 8A.3.4.7), this new proposed new standard is not required and should not be included.</p>
<p>Submission 3.9 Rule 8A.3.4.10 Free-Standing Signs in Business Commercial Zones, Business Industrial Zones, and Special Activity Zones</p>	<p>Support in part the rules pertaining to free-stranding signs in Business Commercial zones, Business Industrial zones and Special Activity zones.</p> <p>Clause (b)(ii) and (c) of Rule 8A.3.4.10 permit free standing signs in Business Commercial Zones and in Business Industrial and Special Activity Zones to a height of 8m and 9m respectively and a width of 2m (i.e. 16m² and 18m²). Notwithstanding this, clause (d) restricts the maximum permitted area to be 7.5m².</p>	<p>Reject the Submission - Para 135, Page 26</p> <p>Having regard to the Council’s urban design adviser’s input, retain the maximum area of any free-standing sign, visible in any one direction shall not exceed 7.5m² because:</p> <ul style="list-style-type: none"> • the provisions would still allow consideration of larger signs on a site by site basis; • the urban context of Upper Hutt and the numerous pockets of commercial zoned land within otherwise predominantly residential zoned areas does not 	<p>The recommendation in the Section 42A Report should be acknowledged. The analysis in the Section 42A Report inappropriately considers the impact of extending the area of all free-standing signs and fails to acknowledge that the scope of the submission is limited to service station signs. The Oil Companies consider it appropriate to extend the permitted area to sanction prime signs at service station sites – noting a prime sign is a standard feature of those sites, that they are integral to and consistent with the development on site and that they are important to ensuring the safe and efficient movement of traffic.</p> <p>The Oil Companies accept, however, that restricted discretionary activity status might be appropriate where a service station is adjacent to residentially zoned land, and that</p>

	<p>Amend clause (d) of Rule 8A.3.4.10 to permit prime signs at service station sites by increasing the maximum permitted area from 7.5m² to 16m² at service stations only.</p>	<p>lend itself to permitted activity status for such signs; and</p> <ul style="list-style-type: none"> • setting the permitted threshold so high could result in inappropriate signage or potential adverse effects in some cases. This is especially so as the purpose of the provisions is to address all commercial zoned land and freestanding signs, not just that owned and operated by the submitters. 	<p>in the Upper Hutt context, this is more often than not likely to be the case. Accordingly, accept the recommendation in the Section 42A Report.</p> <p>The intent of the Oil Companies submission is not met, but the Oil Companies accept the recommendation in the Section 42A Report.</p>
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<p>Further Submission Rule 8A.3.4.10</p>	<p>The Oil Companies oppose a submission by Allison Tindale (submission 2.11) seeking to combine the performance standard of Rules 8A.3.4.10 and 12.</p>	<p>Accept the further submission and reject the primary submission Para 139, Page 26</p> <p>It is appropriate to provide two separate performance standards for ‘free-standing signs in Business Commercial Zones, Business Industrial Zones and Special Activity Zones’ and ‘signs for direction of traffic on a site in Business Commercial, Business Industrial Zones and Special Activity Zones’ (Rule 8A.3.4.10 and 8A.3.4.12 respectively) because:</p> <ul style="list-style-type: none"> • Rule 8A.3.4.12 specifically requires the content for signs for direction of traffic to “be limited to directional purposes”. This would mean that free-standing signs in Business Commercial Zones, Business Industrial Zones and Special Activity Zones could also only be erected if they were for directional purposes, which defeats the purpose of Rule 8A.3.4.10. • Combining the standards would restrict sites with less than 50m of road frontage to only one directional sign or one freestanding sign as a permitted activity which is unduly restrictive. The framework should encourage directional signage as a permitted activity, irrespective of the other free-standing signage standards. This 	<p>Accept the recommendation in the Section 42A Report and retain separate performance standards for Rules 8A.3.4.10 and 8A.3.4.12.</p> <p>Making such a recommendation would be consistent with the intent of the Oil Companies submission.</p>
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		will ensure developments can erect directional signage without foregoing free-standing signs (which are generally erected for site identification and or business advertisement purposes).	
Submission 3.10 Rule 8A.3.4.12	The Oil Companies seek that Rule 8A.3.4.10 is retained, subject to a minor grammatical correction to ensure consistent referencing within the rule, and an increase to the maximum permitted area of a directional sign to 1m ² visible in any one direction.	<p>Accept the submission Para 154, Page 29</p> <p>The requested changes are appropriate because:</p> <ul style="list-style-type: none"> • They represent relatively minor increases to the height and face area of the sign; • The Councils Urban Designer has advised no concern with the requests; and • From a traffic safety perspective, the 1.2m height is consistent with maintaining driver visibility splays when entering a road (note that this change was sought as a result of submission 1.6). 	<p>Accept the recommendation in the Section 42A Report and amend Rule 8A.3.4.12 as follows:</p> <p><i>Signs for direction of traffic on a site in Business Commercial Zones, Business Industrial Zones and Special Activity Zones</i></p> <p>(a) <i>The maximum vertical dimension of the sign shall not exceed 1.2m.</i></p> <p>(b) <i>The maximum area of the sign, visible in any one direction, shall not exceed 0.5 1m².</i></p> <p>Making such a recommendation would be consistent with the intent of the Oil Companies submission.</p>
Further Submission Rule 8A.3.4.13(c)	The Oil Companies opposed in part a request by NZTA (submission 6.13) to insert a new rule which sought, in addition to standards for 8A.4.3.13(a) and (c), to insert new 8A.3.4.13(h) that adds standards for location etc to both >70km roads and < 70km roads. The Oil Companies consider that the additional rule: <ul style="list-style-type: none"> • Duplicates the intention of standard 8A.3.4.13 (a); • Is unclear in its application because it specifically applies to 	<p>Reject the further submission of the Oil Companies and accept (albeit in part) the submission of NZTA. Para 167, Page 31.</p> <p>There is no duplication for the following reasons:</p> <ul style="list-style-type: none"> • Standard (a) is more generally applicable to obscuring signs whereas the requested insertion provides specific clarity in terms of distances in relation to intersections which is currently referenced by 8A.3.4.13 (c). This 	<p>Reject the recommendation in the Section 42A Report and amend Rule 8A.3.4.13(c) as sought in evidence.</p> <p>Refer evidence.</p>

	signs 'within road environments' and the term 'road environment' is not defined and the submitter does not propose to include a definition. The Oil Companies considered that the phrase 'road reserve' is more appropriate than 'road environment'.	is more precise and would improve certainty for plan users. Therefore, it is recommended the standard be accepted and rather than inserted as a new standard, incorporated with (c).	
Rule 8A.3.4.13(f)	The Oil Companies support condition (f) of Rule 8A.3.4.13 relating to signage visible from State Highways. However, the Oil Companies propose an amendment to clause (iii) of Rule 8A.3.4.13(f) to clarify the nature of the 'view' that shall be unrestricted for motorists. It is considered the intent of clause (iii) is to ensure the placement of signage does not obstruct motorists' view of the road, and an amendment to clarify that is required.	Reject Para 162, Page 30 It is considered that the insertion of the words 'of the road' could result in an unintended narrowing of the scope by excluding other components such as visibility splays from driveways.	Reject the recommendation in the Section 42A Report and amend Rule 8A.3.4.13(f) as sought in evidence. Refer evidence.
Submission 3.4 Rule 8A.3.4.14(e)	The Oil Companies support Rule 8A.3.4.14.(e)-Matters of discretion insofar as it appropriately retains the Council's discretion to consider whether there is a functional need for a sign to exceed the permitted size and / or location.	Accept in Part (inferred) Refer Para 131, Page 32 As a result of another submission (2.14) it is proposed to reword matter (b) to neutralise the assessment criteria while still retaining the intent and scope of relevant matters, and to split matter (e) into two parts while retaining the focus on the 'sign' rather than widen the scope to the 'site' more generally.	Accept the recommendation in the Section 42A Report by amending Rule 8A.3.4.14 as follows: (b) <u>Effect of the sign on the appearance of the building to which it is attached due to:</u> (i) The proportion of the sign to the building façade; and (ii) The location of and design of the sign, including the colour, display, materials, and how the sign relates to any architectural features on the building; and (iii) The number of signs on the building. ...

			<p><u>(e) Whether there are any special circumstances or functional need for proposed signage including operational, directional or safety reasons;</u></p> <p><u>(f) Whether vegetation or landscaping would mitigate the visual impact of the sign.</u></p> <p>Making such a recommendation would be consistent with the intent of the Oil Companies submission.</p>
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