

**RESOURCE MANAGEMENT ACT 1991
SUBMISSION ON PUBLICLY NOTIFIED PLAN CHANGE 48**

SIGNS

TO: QUEENSTOWN LAKES DISTRICT COUNCIL

AND TO: Queenstown Lakes District Council
Private Bag 50075
QUEENSTOWN
Attention:
Email: services@qldc.govt.nz

NAME: SHOTOVER PARK LIMITED
C/- Jenny Carter
Shotover Park
PO Box 1075
QUEENSTOWN

SHOTOVER Park Limited makes this submission on Plan Change 48: Signs.

1. GENERAL

Explanation

SPL supports the aim of the Plan Change to reduce the current complexity of the Districts signs provisions and in particular as they relate to Shotover Park Limited (SPL). However, there are some further improvements that can be made to reduce complexity and cost, and the current drafting of the Rules fails to recognise the difference between various zones.

SPL owns land adjacent to the Glenda Drive industrial zone. The SPL land is subject to Plan Change 19. While Plan Change 19 is not confirmed, land owned by SPL is proposed to be developed for a range of industrial and service activities, in accordance with the proposed E1 and E2 activity areas.

The Plan Change fails to recognise that it is the quality of signage that is important, not necessarily the quantity. By retaining the same approach as previously provided in the District Plan; which is to impose a strict set of standards controlling size and location of signs, the Plan Change fails to reduce resource consent requirements. All that is changed is that if a sign fails to comply with the proposed standards, it is discretionary rather than non-complying.

The Plan Change does not address the issue of the quality of signs and their construction and visibility. Instead, the Plan Change principally relates to controlling the installation of the sign, with no regard for the purpose of signs from the viewer's perspective or position. Good signage from a way finding requirement is much more important in a resort town such as Queenstown where the parties benefiting from effective directional signage change frequently and where English may not necessarily be their first language. This makes it important to achieve clarity and simplicity, and more signs rather than less may be an advantage. Against this perspective the quantity of signs as in their size or multiplicity are very secondary issues yet they are the only issues being addressed by the Plan Change.

The signage standards are too inflexible and do not take account of the need to direct people into facilities. In addition, the standards fail to recognise and provide for tenancies with more than one entrance.

As currently drafted, the signs provisions impose the same signage restrictions for the E1 and E2 activity areas as what is imposed in the town centre zones (Queenstown CBD, Wanaka CBD). Given the vast difference between the town centre zones and industrial zones, this does not represent good planning.

Activity Area E1, by its very nature, will provide a different signs requirement with signs potentially being viewed from a greater distance, and frequently from a vehicle. The level of amenity and signs needed will therefore be different than, for example, the Queenstown CBD. It is therefore questioned why it is proposed that the same rules apply.

E1 will, because of the anticipated uses, most likely be vehicle orientated. However, the Queenstown CBD, for example, will be pedestrian orientated (we accept that there will be other examples of pedestrian orientated centres within the district). The signage standards for Activity Areas E1 and E2 should take into account the type of activity allowed within the zone, and should be more permissive as to size and location. Certainly it is important to ensure that E2 as viewed from the Eastern Arterial Road (EAR) does not take on the appearance of a strip mall, with ugly signs of all shapes and sizes crowding the viewers perspective. All buildings within E1 and E2 are a controlled activity. Any signage should be incorporated within the resource consent application for the building. No further controls are needed.

Other aspects of the Plan Change not supported by SPL are that it:

- does not accord with, or assist the territorial authority to carry out its functions to achieve, the purpose of the Resource Management Act 1991 (the "Act");
- does not promote sustainable management;
- does not meet section 32 of the Act;
- does not represent integrated management or sound resource management practice;
- does not implement the settled objectives and policies of the RPZ;
- is not the most appropriate method for achieving the objectives of the District Plan having regard to its efficiency and effectiveness, and taking into account the costs and benefits.

Relief sought:

1. Amend the Plan Change so that it reflects the importance of the quality of signage, rather than the number of signs, and their size.
2. Amend the Plan Change so that it is effective in reducing the need to make applications for resource consents for signage.
3. Amend the signs plan change to achieve greater efficiency and effectiveness.
4. Amend the signage rules to allow more appropriate signage provisions for industrial and service zones (particularly E1 and E2), recognising the anticipated uses within those areas. This can be achieved by assessing all signage in the SPL land (E1 and E2) as part of the controlled activity resource consent for the building. No further controls are needed.
5. Insert new policy provisions that recognise the difference between industrial and service zones and town centres, and that reflect a more appropriate approach to signage within the SPL land.

6. Any further and consequential relief to give effect to this submission

Shotover Park Limited wishes to be heard in support of this submission.

SHOTOVER PARK LIMITED



Jenny Carter
SHOTOVER PARK LIMITED
9 April 2014