



This document contains:

1. The verbal submission to the Statutory Hearing on the Signs on Roads Bylaw.

The SH committee comprised:

Clr Maureen Waaka (Chair)
Clr Geoff Kenny
Clr Bob Martin
Clr Maggie Bentley
Clr Glenys Searanke

2. The formal submission to RDC on the Signs on Roads Bylaw

Verbal Submission to the Rotorua District Council

Draft Proposed Signs on Roads By-Law 2008

The Rotorua Chamber of Commerce (RCC) would like to thank the Rotorua District Council (RDC) for the opportunity to make a submission on the proposed changes to the Signs on Roads By-Law.

Speaking to our submission, I would like to re-iterate the core points

1. Time and purpose of the signage should be a consideration
2. Differentiation of short term directional signage
3. Specified use of trailer mounted signs
4. Additional monitoring and compliance costs on RDC
5. Additional compliance costs on businesses and organisations
6. The validity of this being a safety issue
7. The needs of various industry sectors

You have a copy of our submission. I therefore have no intention of repeating verbatim the content, rather to emphasize some of our issues with this legislation.

The first is the issue of 'Why introduce another new by-law? I have asked the questions whether this was a simplification issue? A safety issue? What are the negative aspects of the current regime?

The simplification issue – a response by Jim Nicklin advises that this bylaw is intended to replace the current signs and hoardings bylaw and that the current bylaw will be revoked with any other signage not covered by this new by law will now be controlled by the district plan.

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This by-law appears not to simplify as intending erectors of signs will still have to access both the District plan and the By-law to ensure compliance. If the RDC is going to develop a set of guidelines on signage, then let's make it a single point of access that covers all signage. Let's simplify the process and reduce the complexity of compliance. Make distinction between temporary and permanent signage and the requirements for each in a single point of access.

The Safety issue - Again a response to a question of Jim Nicklin as to whether any quantitative data had been collected on any accidents or any risks to persons that have occurred in the Rotorua District as a result of sign placement – the answer – the council has not collected any such data – so, although safety is identify as an objective, there is no quantitative date that suggests that safety under the current legislative regime is an issue.

What are the negative consequences of the current regime? As a ratepayer, I have little problem with whether a house for sale sign is parallel or perpendicular to a boundary. I have no problem with directional signs to open homes. In driving around the city, I am not aware of any instances where there has been any grossly negative impacts on the aesthetic quality of the city which could not be addressed by the current legislation. Equally I am not aware of any instance where organisations have blatantly abused or contradicted the intent of the current legislation. The one batch of signs which asthetically questionable is the plethora of signs we see around election time – multiple per property and some of the mug-shots well.....

It would appear that the intent of this legislation is to be more definitive and comprehensive in its scope. In fact to capture all instances of signs on roads and to require an application for a permit on each occasion that the signs are erected.

We are concerned at the impact that the scope of this by-law will have on the compliance costs both on the administration by the Council and the compliance by the ratepayer.

I would suggest that the broadening of the scope of this legislation is another increase in bureaucratic control which will result in increased costs across the board. I question how the RDC is going to monitor and control such aspects as 2 hours before and ½ an hour after an open home, or that open home signs should not penetrate the ground by 100mm, or there should be no more than four. How can you ensure compliance of these requirements. Are we going to see the 'sign police' driving around? If it's not enforceable without considerable officer monitoring then it is un-enforceable and should be removed from the bylaw, or identified as a guideline rather than mandatory.

We hear annually that part of the increasing costs of local government is a result of devolution of responsibilities by Central Government. Part of the increase in this year's rates in the annual plan is as a result of additional staff to meet compliance requirements. I would suggest that this legislation would contribute to further requirements as additional staff time and costs are required to ensure compliance with this legislation.

The applications for permits will placed additional time and costs on organisations to complete and submit and possibly could be disadvantaged by a time delay as permits are reviewed and approved.

I would suggest that a better method of administering such a by-law rather than requiring a permit would be to issue a license for temporary display. Where the terms of display are a requirement of the license. The license would be readily available by submitting a form (at the time of submission such as is now the case with a driver's license). The penalties for abusing or non-compliance with the terms could be set as to deter infringements.

It is also suggested that a multiple license could be issued for organisations that may have number of occasions or repeated display of a particular or type of signage. Again the penalties for abuse would deter business organisations from infringement with the threat of withdrawal of the opportunity.

Our recommendation would be that you withdraw consideration of this bylaw until the above have been considered.

7 January 2008

Submission to the Rotorua District Council

Draft Proposed Signs on Roads By-Law 2008

The Rotorua Chamber of Commerce (RCC) would like to thank the Rotorua District Council (RDC) for the opportunity to make a submission on the proposed changes to the Signs on Roads By-Law.

In doing so, the RCC would like to make the following points:

1. The proposed blanket changes to the by-law attempt to establish a regulation that affects all signage opportunities and placements. The time period, purpose, message and clarity contained in the signage should have an influence on the opportunity to display signs. As an example short period of placement of directional signs to an event (open home, gala, sports event) have a different level of interest to passing traffic than a informational or motivational sign that requires a longer period to read the message.
2. The RCC requests clarification on whether the directional short term signage will apply to any event or occasion administered or organized by RDC.
3. The RCC requests that there be clarification on banner cross road signage, for example, a banner strung from one side of Hinemoa street to the other advertising an event or expo. Does this come under the by-law?
4. Clarification is requested on signage attached to lampposts or power post and signage placed in central median grass verge.
5. There have been occasions when larger core flute, trailer mounted signs have been used to acknowledge organisational achievement, welcome visitors to the city, promote larger events and a variety of other purposes. The RCC would like this opportunity to continue.
6. The RCC acknowledges the need for guidelines on signage and placement but questions the requirement for the by-law to be controlled by RDC permit. The costs of monitoring compliance and administration of processes is an additional cost on the ratepayer. The RCC recommends that the requirements be promoted in the public domain to ensure public understanding. The RCC would suggest the suggested regime of permit application contributes a further layer of beaurocracy and opportunity for subjective interpretation of legislation.

7. The requirement for permit application will also impose a considerable cost in dollars (assuming there will be a cost for the permit) and time on any organisation wanting to promote an event. This may impose an additional financial burden on community organisations that have a challenge with funding.
8. The RCC considers that sign placement should reflect the issue of readability and safety. The placement of the signs perpendicular to curbside and hence traffic flow make for easier and hence safer readability. Driver reading the sign can be done from a greater lateral distance from the sign and with less divergence of line of sight from line of motion of vehicle. A sign placement parallel to the curbside and hence to traffic flow would result in vehicle drivers having to be closer to the sign before being able to read and when closer the line of sight to read would be a considerable angle from line of motion of the vehicle.
9. The RCC considers that the calculated area of relevant signage should be better defined. The RCC suggests that if the sign is two sided with each side projected to a different traffic or pedestrian flow, then the sign area for the purposes of this by-law be assessed as the square meterage of a single side only. The two sided nature of the sign has no impact on safety or aesthetics.
10. The RCC requests that the RDC reconsiders the clause relating to vehicles including trailers. There have been a number of occasions historically for major events where a core-flute sign mounted on a trailer has been used. This is one of the few methods where appropriately sized signage can be utilised to promote various mega-events.
11. The RCC suggests that flexibility should be considered in terms of placement, height limitations, and size of signage to better reflect the needs of the Real Estate business sector and the promotion of sale of commercial and industrial properties.

The Rotorua Chamber of Commerce thanks you for the opportunity to make this submission. We would like the opportunity to be heard to support this submission.

Yours sincerely

Roger Gordon
Chief Executive Officer

Christa George
President