BEFORE A PANEL OF INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE HUTT CITY COUNCIL

IN THE MATTER of the Resource Management Act 1991 (the **Act**)

AND

IN THE MATTER of Proposed Hutt District Plan (**PDP**)

HEARINGS STATEMENT OF ELLIOTT THORNTON ON BEHALF OF NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI

Dated: 14 October 2026

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1. INTRODUCTION, QUALIFICATIONS AND EXPERIENCE

1.1 My name is Elliott Thornotn. I am a Principal Planner with the New Zealand Transport Agency Waka Kotahi (NZTA).

1.2 The purpose of this brief statement is to identify the submission points where NZTA no longer seeks the relief requested in its original submission.

1.3 Since lodging its submission, NZTA has reviewed the Section 42A reporting officer recommendations, recommended plan amendments, and other submitter positions. In addition, while I was not the author of the original submission, on further review of the original plan provisions, it has become clear that the proposed plan provisions adequately address many of NZTA's concerns and therefore are the relief originally sought is no longer required to address NZTA's interests.

1.4 Accordingly, NZTA requests that the Hearing Panel record the following submission points no longer being pursued.

1.5 In relation to digital billboards, I would like to note for the panel's information, that NZTA have recently published new guidance as they relate to third party digital billboards[1]. The guidance supports the latest research and position of the Council's PDP as they related to digital billboards, including that they are not located on or visible from a State Highway with a speed limit of 80 km/hr which includes all of State Highway 2 in Lower Hutt.

1.6 The guidance was developed through an extensive multi-year process, including technical review, stakeholder engagement and formal consultation. It builds on earlier guidance, incorporating updated evidence, independent expert review, safety specialists, local authorities, consultants and representatives of the digital advertising industry. A formal four-month consultation process carried out between October 2025 and February 2026. 22 submissions were received from Council's, industry organisations, safety practitioners and NZTA personnel, and substantial changes resulted including refinement of technical assessment criteria, strengthening of definitions and assessment pathways.

[1] https://www.nzta.govt.nz/assets/resources/planning-policy-manual/docs/PPM-digital-advertising-billboards-and-road-safety-guide-sept-2026.pdf

1.7 The submission resulted in a significant degree of alignment on the assessment framework and technical parameters for digital billboards, and is incorporated into NZTA's Planning Policy Manual, which for the purposes of a resource consent, would be likely form an 'other matter' under section 104(1)(c) of the Resource Management Act 1991, weighted appropriately as determined by the Council at the time of a resource consent.

1.8 As the guidance and the notified plan provisions discourage digital billboards visible from State Highway, a position which is also supported by the Wellington City Plan 2024, no specific relief is sought in relation to dwell times or illumination.

2. MATTERS NO LONGER PURSUED

SUBMISSION POINT	RELIEF ORIGINALLY SOUTH	REASON RELIEF IS NO LONGER SOUGHT
77	Addition to overview of signs chapter a statement that signs located on, or over, State highways require approvals from NZTA.	I agree with Mr. Bellamy[2] that this statement is no longer necessary, as NZTA are effectively the landowners and any third party signage would require consent from NZTA under the Government Roading Powers Act 1989 and 2010 Bylaw[3].
80	Amendment to Policy SIGN-P4 lowering of speed limit to which signs should not be visible, and addition of a requirement to consider the cumulative effects of digital billboards.	While Mr. Bellamy supports the reduction of the speed to 70 km/hr[4], I note that State Highway 2 (SH2) being the only state highway within Lower Hutt does not have a posted speed limit of less than 80km/hr. The proposed lowering of the speed may remain of interest to Hutt City Council as per the list of roads in para 96 of the 42A report. With regards to cumulative effects, I agree with the statement of Mr. Ballamy[5] that

[2] Para 67 of the Section 42A report
[3] https://www.nzta.govt.nz/assets/resources/Bylaws-state-highway/Bylaw-2010-New-Zealand-Transport-Agency-Signs-on-State-Highways-Bylaw-July-2010.pdf
[4] Para 93 of the Section 42A report
[5] Para 94 Section 42A report

		SIGN-P1.4 and P1.6 address this, along with the definition of effects under section 3 of the RMA which includes under (d) cumulative effects.
82	Addition to Rule SIGN-R1(1) visibility from the state highway network	I agree with Mr. Bellamy[6] in that standard SIGN-S8 that requires that static signs visible from state highway meet certain minimum requirements in relation to content, and lettering height which adequately addresses NZTA's interests.
83	Addition to Rule SIGN-R1(2) of Limited Notification to NZTA for non-compliances.	I agree with Mr. Bellamy[7] in that section 95B of the RMA does not provide a mechanism for a rule to consider a person adversely affected.
84	Addition to Rule SIGN-R3(1) regarding visibility from State Highway of content.	Since NZTA's original submission, NZTA has released guidance for digital billboards visible from State Highway[8] which represents best practice guidance on managing effects of digital signage. I note where any digital billboard that is visible from State Highway under SIGN-R3, would not meet condition (1)(a)(iv) and trigger a non-complying activity under Rule SIGN-R3(2) or (3) depending on the zone. As a non-complying activity, there is wide scope to consider effects, including under SIGN-P6 impacts on the safety and efficiency of the transport network.
85	Addition to Rule SIGN-R3(2) of Limited Notification to NZTA for non-compliances.	See response to submission 83.
86, 87, 88	Additional of amendments to SIGN-S1 regarding safety and	I agree with Mr. Bellamy[9] that the matters of discretion under rule SIGN-R1(2) which

[6] Para 113 Section 42A report
[7] Para 115 Section 42A report
[8] https://www.nzta.govt.nz/assets/resources/planning-policy-manual/docs/PPM-digital-advertising-billboards-and-road-safety-guide-sept-2026.pdf
[9] Para 181 of the Section 42A report

	efficiency of the transport network.	includes non-compliance with SIGN-S1, 2 and 4 extend to SIGN-P6 which relates to the safety and efficiency of the transport network and need not be repeated.
89, 90	Amendment to SIGN-S6/7 regarding orientation to State Highway including on ramps and off ramps.	I agree with Mr. Bellamy[10] that this is adequately addressed by Rule SIGN-R1.
91	Amendment to SIGN-S8 relating to speed of signage and exclusion of logos.	See response to submission point 80. With regards to logos, these are typically easily identifiable and unlikely to cause distraction however if containing lettering, would still need to comply with minimum lettering heights.
92	Amendment to SIGN-S9 relating to illumination of roads	I agree with Mr. Bellamy[11] that this is addressed sufficiently by the lighting chapter, and with regards to digital billboards, there is no permitted pathway.
93	Amendment to TEMP-O2 to include effects on safety and operation of the State Highway network.	I consider that TEMP-O2(5) which relates broadly to temporary effects in combination to TEMP-P4 and TEMP-P7 as per suggested modifications by Ms Heppethwaite sufficient to address safety and operation of the State Highway network.
96	Amendment to TEMP-S4 relating to 200 vehicle movements and additional as a matter of discretion effects on the safety and operation of the State Highway network.	I agree with Mr. Davis[12] that attendance of people is amore practical and effective threshold mechanism for temporary activities, and that notwithstanding, TR-R3 of the Transport Chapter does not exclude temporary activities, and Table 8 maintains a threshold of 200 vehicles/day.

[10] Para 233 of the Section 42A report
[11] Para 261 of the Section 42A report
[12] Para 281 of the Section 42A report

3. CONCLUSIONS

3.1 For the submission points identified in the table above, NZTA no longer seek amendments to the PDP.

3.2 In relation to digital billboards, the newly released guidance is considered to adequately address NZTA interests along with the provisions of the notified PDP, in particular that they are not visible from the State Highway.

3.3 NZTA continues to seek the relief in its primary evidence and all remaining submission points not listed above.

3.4 NZTA thanks the Hearing Panel and Council officers for their consideration of its submission.

Elliott Thornton

Dated 14 October 2026