

Hamilton City Council – Staff Feedback

Planning Policy Manual – Digital Advertising Billboards and Road Safety Consultation (30 September 2025)

NZ Transport Agency

14 November 2025

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this staff feedback is aligned with all of Hamilton City Council's five priorities.

Council Approval and Reference

This staff feedback was approved by Hamilton City Council's Chief Executive on 14 November 2025.

Feedback # 820

It should be noted that the following feedback is from staff at Hamilton City Council and does not, therefore, necessarily represent the views of the Council itself.

Key Messages and Recommendations

- 1. Introduction**
2. Hamilton City Council staff support the intent of NZTA's draft Planning Policy Manual (PPM) but recommend separating its content into:
 - a. **General guidance** for all Road Controlling Authorities (RCAs), and
 - b. **Specific policy** for NZTA as the State Highway RCA.
3. Staff propose relocating technical content to the **Traffic Control Devices (TCD) Manual Part 3 – Advertising Signs**, where RCAs expect to find it, leaving policy content in the PPM.
- 4. Current Local Approach**
5. Hamilton's Operative District Plan (ODP) regulates signage through provisions on size, location, illumination, and safety, especially in transport corridors. Signs must not obstruct visibility or resemble traffic signals. The ODP aligns with NZTA's safety-focused approach.
- 6. Support for NZTA Guidance**
7. Staff endorse the Safe System approach and principles for assessing billboard suitability. They support luminance limits aligned with AS/NZS4282:2023 and recommend clearer measurement standards to aid compliance.
- 8. Key Recommendations**
 - a. **Terminology:** Align 'must', 'should', and 'may' with TCD Manual standards to clarify legal versus best practice guidance.
 - b. **Human Factors:** Section 6's research on driver distraction is valuable; staff suggest ongoing updates.
 - c. **Location:** Clarify billboard placement on the right-hand side of carriageways and consider median types and crash risks.
 - d. **Lighting:** Specify luminance testing methods and consider off-peak shutoff to reduce light pollution and energy use.
 - e. **Compliance:** Define minimum monitoring requirements and remove outdated clauses (e.g., filament visibility).
9. Staff emphasise the need for clearer, more consistent technical guidance and policy separation to support safer, more effective billboard management across jurisdictions.

Introduction

10. Hamilton City Council staff welcome the opportunity to provide feedback on the NZ Transport Agency's (NZTA's) 30 September 2025 **Planning Policy Manual – Digital Advertising Billboards and Road Safety Consultation**.
11. Staff support the general content included in the NZTA's 30 September 2025 draft document, as it will support both the refinement of local authority District Plans as those processes arise, and will also help to provide more clarity regarding their implementation with regard to digital advertising signage.
12. However, and for this reason, staff do not believe all the content should be included in one document as is proposed, but instead, should be separated into general guidance suitable for all Road Controlling Authorities (RCAs), and the specific policy statements for the NZTA as the RCA for State Highways.
13. Staff recommend that the technical parts of the Digital Advertising Billboards and Road Safety document be relocated as an update to the Traffic Control Devices Manual (TCD Manual) Part 3 – Advertising Signs, where local RCAs would expect to find it. This would leave just the State Highway policy parts of the document located in the Planning Policy Manual (PPM), as they are specific to NZTA as the State Highway RCA.

Current Approach to the Control of Signage Throughout the City

14. Signage (in various forms, including electronic signs or digital billboards) is both provided for and controlled by the Hamilton City Operative District Plan (ODP). Various provisions and standards are found within several chapters, but particularly within the City-Wide chapter (Chapter 25.10, Vol. 1).
15. The provisions control aspects such as the number, size, location and appearance of signs; the effects from illumination, light spill, flashing or reflection; the visual and amenity impact and the contribution signage can have on the creation of an attractive and vibrant central city.
16. As noted in the ODP:
 - a. The erection of signs on Hamilton City Council land and public places is controlled under a bylaw for public places. Information on the size and format of traffic signs is set out in the Regional Infrastructure Technical Specification.
 - b. Signs on State Highways are controlled under the New Zealand Transport Agency's 'Manual of Traffic Signs' and 'Markings and Traffic Control Devices Manual', and that:
 - c. Where the sign is adjacent to a State Highway with a speed limit higher than 60 km/h, NZTA comments shall be taken into account.
17. Within the Transport Corridor Zone specifically (Chapter 18, Vol. 1), the ODP provides for 'other activities and structures' that include advertising signs, and there are several provisions to control these, including:
 - a. Objective 18.2.4 – "*Non-network utility activities and structures within transport corridors contribute to the amenity, vibrancy and attractiveness of the City*".
 - b. Policy 18.2.4a – "*Other activities and structures, including street trees, shall be provided for when they do not compromise the function, safety and efficiency of the transport corridor, and the provision and operation of network utility infrastructure*".

18. The key is that these activities will only be provided if they do not adversely affect the operation of the corridor or network utilities, and this is aligned with NZTA's approach and thinking.

19. The purpose of the ODP provisions relevant to this discussion includes that (ODP Vol 1, Chapter 25.10.1):

- Signs and other outdoor advertising displays are important for communicating information to the public. They provide directions, identify premises, assist businesses in selling goods and services, and promote events and activities.
- The quality and location of signs have the potential to contribute positively to an area but also have the potential to create adverse visual effects, particularly in areas where high amenity levels are expected.
- The location of signs, particularly on or adjacent to transport corridors, also has the potential to adversely affect traffic safety. The District Plan controls signs to preserve accepted levels of amenity and safety. In particular, the Plan controls high-intensity signs in all zones, signs on historic heritage buildings and sites, and provides more permissive standards in the Central City, Business, Industrial, Ruakura Logistics and Ruakura Industrial Park Zones, such as enabling signs that do not relate to the on-site activity.

20. 25.10.4 provides several general standards, including that:

- Signs shall not project over a transport corridor or be located within a transport corridor (except as provided for in 25.10.5.10 – Veranda Signs above the Transport Corridor Zone), other than a traffic sign or safety sign erected by, or at the direction of, a public authority or a sign controlled under a Council bylaw.
- Signs shall not be placed so they block sight distances at intersections or driveways.
- A sign must not display any image that:
 - Resembles or is likely to be confused with any traffic sign or signal.
 - Contains reflective, fluorescent or phosphorescent materials that will reflect headlights, or distract and interfere with a road user's vision.
 - Uses flashing or revolving lights or lasers, or any other method of illumination that will dazzle or distract drivers.

21. Staff note and support the following statements in the draft manual:

- Page 16 – “Controlling the amenity effects of signs is primarily a local authority function. The local authority typically provides guidance for signs through its district plan or bylaws”.*
- Page 17 – “the luminance levels at either 20m from the digital billboard or the edge of the road seal, whichever is closer, should not exceed either the district plan maximum luminance levels and the relevant maximum luminance levels defined in AS/NZS4282:2023”.*

22. Staff support the stated underlying aim of the guidance, which is to ensure that the installation and operation of digital billboards align with the Safe System approach, which seeks to create a safe and forgiving transport system that makes safety a priority and recognises that people make mistakes and are vulnerable in a crash.

23. Acknowledging that the manual will only apply to digital billboards visible from or within the State Highway corridor, staff support the key principles which promote the robust assessment of an environment's suitability pre and post digital billboard installation (page 14). This will help ensure a degree of flexibility is maintained during the consenting process.

Traffic Control Devices Manual Part 3 – Advertising Signs

24. Local Authority RCAs have traditionally used the Traffic Control Devices Manual (TCD Manual) for guidance on transport and road safety. Local RCAs have also contributed to the development of the TCD Manual through involvement in the TCD Steering Group and subsequent sector consultation on updates to the various Parts of the Manual.
25. It is disappointing to note that the technical content of the Digital Advertising Billboards and Road Safety draft document has not been included in the development of the TCD Manual Part 3 – Advertising Signs, which is where RCAs would expect it to be.
26. Staff note that the Digital Advertising Billboards and Road Safety draft document includes considerable research overview to support the technical content and the associated State Highway policy decisions, and recommends that this is more appropriately referenced in appendices(s) to the TCD Manual Part 3 to ensure the guidance remains focused and concise, as for the current content of the TCD Manual Part 3.
27. Staff agree that the State Highway policy parts of the draft document are appropriately located in the Planning Policy Manual (PPM) as they are specific to NZTA as the State Highway RCA.

‘Must’, ‘Should’ and ‘May’ Terminology

28. Staff request that the terminology in the NZTA’s draft document is consistent with that used throughout the TCD Manual with regard to whether an aspect or statement made is a requirement under law or good practice. This is detailed in The TCD Manual Part 3 on page 1-1 with explanations of ‘must’, ‘should’ or ‘may’ terminology.
29. Staff note for example that in Section 4 ‘Non-static displays’ (page 5) of the draft document, the word ‘shall’ has been used, and in Section 5 ‘Digital signs within the State Highway corridor’ (page 5), the word ‘will’ has been used.
30. Staff submit that separating the technical content and the policy content will help address this confusion, allowing ‘must’, ‘should’ and ‘may’ to be retained in the technical content, and ‘shall’ or ‘will’ to be used in the policy content.

Digital Billboards, Human Factors and Driver Distraction

31. Staff submit that the information presented in Section 6 is a positive addition to the document as it highlights the likely impact on a driver’s behaviour based on good research while identifying the limitations of the current research.
32. When considering an application for these billboards, RCAs have tried to push back based on the newly introduced risk created by these billboards, only to be met with the argument that there are no crashes in the NZTA’s Crash Analysis System (CAS) that were caused by being distracted by an advertising sign. The research presented in Section 6 should hopefully allow RCAs to reframe that discussion towards locating billboards in a less risky position.
33. Staff recommend that the information in Section 6 be updated as new research becomes available.

Crash Risk and Speed

34. Staff agree with the contents of Section 7.
35. Staff draw attention to the cross-reference error in section 7.1, for Figures 1 and 2.

Location

36. Staff note that the document does not currently define whether billboards should only be on the left-hand side of the carriageway or be permitted on the right-hand side as well, perhaps with conditions.
37. The document only makes reference to a change in a driver's lane discipline when presented with a billboard (Section 6.3).
38. Staff recommend that, when considering whether or not billboards should be permitted on the right-hand side of the carriageway, a change in a driver's lane discipline should reflect the potential increase in head-on crash types.
39. Staff also recommend that whether a median is present, what type of median it is (guardrail versus low-planted or concrete divider), and how that might influence billboards being erected on the right-hand side, should also be discussed in the document.

Lighting – Luminance Levels

40. Staff submit that the document should specify the relevant maximum luminance levels, and that they should be tested when the sign is 100% white and at full brightness.
41. Our experience has been that so-called 'compliant' billboards can be very bright at nighttime, and there is confusion and/or a lack of understanding about how to measure luminance appropriately, resulting in different luminance levels at different billboards.
42. Typically, the 'Approving Party' has little specific technical knowledge when it comes to measuring luminance of these LED Billboards and thus relies heavily on the evidence provided by the Applicant's expert to state compliance, and this is generally in a very technical report with a conclusion that states that the sign complies. The Approving Party generally does not have a reference to understand whether the report is correct or not.
43. Staff recommend that the document specify consistent luminance levels and clearly outline how they are to be measured. This would provide a definitive benchmark for the Approving Party to assess compliance. While recognising that achieving full standardisation across the country may be challenging, establishing a common reference point could nonetheless support greater consistency and help reduce compliance costs over time.
44. Staff acknowledge that AS/NZS4282 may already state the compliance levels, and should still be referenced for completeness, but given that the maximum luminance levels for these billboards is unlikely to change overtime, staff consider that having them stated in this document removes the need to reference yet another document by the Approving Party so is more likely to result in correctly conditioned resource consents and therefore more compliant and consistent billboards in the road environment.

Lighting – Compliance Requirements

45. Staff submit that the term "*the digital billboard must not have a filament visible to motorists*" may be redundant in relation to LED Billboards. We understand that newer LEDs work, and their design can help minimise light spill and wider light pollution, but this also means that the driver is looking directly at the 'filament'.
46. Assuming that our understanding is correct, this clause effectively makes all of the billboards non-compliant, and, if allowing this non-conformance, it could bring into debate what other conditions in the document are also up for debate.
47. Staff therefore recommend that this clause be deleted.

Lighting – Off-Peak Nighttime Shutoff

48. Staff submit that in most situations, having these signs operating 24/7 can be very wasteful, both in terms of electricity usage but also in terms of light pollution and the damaging effect these billboards might have on plants and animals.
49. Also, with the increasing number of commercial developments being multi-level with residential accommodation on the upper floors, there is an increasing number of people who are living within close proximity to digital billboards.
50. Staff recommend that some guidance is provided in the document enabling forcing these signs to be switched off at the very lowest night-time traffic volumes when their advertising effect is effectively negligible.

Compliance Monitoring

51. Staff agree with the need to monitor billboards for ongoing compliance.
52. Staff submit that the document could usefully outline the minimum requirements for this monitoring.

Further Information and Opportunity to Discuss our Feedback

53. Should the NZ Transport Agency require clarification of the feedback from Hamilton City Council staff, or additional information, please contact **Glenn Bunting** (Urban Integration Principal, Transport – Plan, Strategy and Programming) on **021 962 829**, or email Glenn.Bunting@hcc.govt.nz in the first instance.
54. Hamilton City Council representatives would welcome the opportunity to discuss the content of this feedback in more detail with the NZ Transport Agency.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

FURTHER INFORMATION

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