

14 November 2025

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Teena koutou katoa,

Submission from Waikato District Council on NZTA Planning Policy Manual - Draft Digital Advertising Billboards and Road Safety Guidance

Waikato District Council (Council) welcomes the opportunity to provide feedback on the proposed Planning Policy Manual – Digital Advertising Billboards and Road Safety Guidance. As a territorial authority with several state highways traversing both urban and rural communities, we have a vested interest in ensuring that transport infrastructure supports safety, community wellbeing, and the unique character of our district.

The Waikato District is experiencing significant population growth and change, with increasing development in smaller towns and villages across the district. As these communities grow, areas that may currently seem less relevant for commercial activity, such as digital advertising, may become more attractive in the near future. This evolving landscape means that today's community preferences and sensitivities, particularly around visual amenity, rural character, and road safety, are likely to shift over time.

Council considers that planning guidance must be both responsive and forward-looking, ensuring that future decisions reflect not only current community values but also anticipate emerging needs and expectations. By embedding adaptability into policy frameworks, Council can be better positioned to manage change effectively, uphold safety and amenity standards, and support the long-term wellbeing of our communities.

Council acknowledges that the integration of digital advertising billboards into New Zealand's transport environment presents a complex intersection of safety, environmental, cultural, and economic considerations. While technological advancements offer new opportunities for communication, they also introduce risks that may compromise road safety by causing driver distraction, become a traffic hazard, cause confusion with official road signs and risk the erosion of rural character in communities. There is a need to balance technological advancement with these risks.

Council advocates for a future-focused, safety-led approach that fosters innovation while protecting the integrity and safety of our communities.

Council supports NZTA's aim in preparing the guidance to "... ensure that the installation and operation of digital billboards aligns with the Safe System approach." Council considers it beneficial to include this best practice guidance for digital advertising billboards in the Planning Policy Manual that should include the location, display and content of the billboards in order to prioritise safety in the associated decision-making processes.

While Council recognises that the draft guidance applies specifically to digital advertising billboards within and visible from the state highway corridor, the preparation of New Zealand specific guidance is useful if in the future, Council as a Rooding Control Authority, wishes to implement similar guidance for digital advertising billboards on local roads.

Council understands that NZTA has, in the preparation of this guidance, undertaken an extensive literature review of relevant guidance and studies (national and international) on the effects of the presence of digital advertising billboards on driver behaviour as evidenced in Sections 6 and 7 of the consultation document. As stated in the consultation document, the results of many studies suggest that digital billboards cause distractions. Although Council notes that the consultation document also states "... researchers are often unable to conclude whether this [distraction] is significant enough to compromise safety...", Council is supportive of NZTA's position that "Digital signs are only acceptable in locations where the additional risk to roads users is deemed minimal."

As noted in the consultation document, more robust investigations are still needed to better understand the performance influences from digital billboards on driver behaviour, however, in the absence of further investigations, Council agrees that a cautious position should be taken to avoid increasing the road safety risk to road users.

In addition to Council's support for the general aim of the guidance, Council is also mostly supportive of the proposed criteria to assess the suitability of the installation of digital billboards.

Council's submission addresses aspects of the consultation material most relevant to the role of local government. Accordingly, our submission references the relevant sections and tables throughout the document.

Non-static displays (Section 4)

Council is supportive of NZTA's position that non-static advertising displays shall not be installed within the state highway corridor or in locations where they could be viewed from the state highway corridor.

Digital signs within the state highway corridor (Section 5)

Council is supportive of NZTA's position that they will not approve (or provide affected party approval for) the installation of digital advertising signs in the state highway corridor due to the potential impacts they have on the safety of road users.

Crash risk and speed (Section 7)

In lower speed environments (below 80 km/h), Council supports the guidance that digital signs are only acceptable in locations where the additional risk to road users is deemed minimal, and that the digital signs should be assessed on a case-by-case basis following principles and requirements generally aligned with those outlined in Section 8 and Section 9.

In higher speed environments (80 km/h and above), Council supports NZTA's view that digital billboards are inconsistent with the Safe System approach and that NZTA will not provide affected party approval for resource consents for digital signs visible from the state highway.

Digital sign assessment principles (Section 8)

Council supports the use of the principles identified in Table 3 to promote the robust assessment of an environment's suitability pre and post digital billboard installation.

Overhead billboards (Section 9.1)

Council is supportive of NZTA's position that they will not permit overhead or gantry billboards within/above the state highway road reserve.

Location (Section 9.2)

Council is supportive of the intent of NZTA's recommendation for locating digital billboards away from particular road features as described in Section 9.2, however, seeks further clarification on the use of Austroads Safe Intersection Sight Distances (SISD) for determining minimum safe separation distances. From the consultation document, Council understands the intent of the use of SISD for separation distances is to limit environmental complexity, i.e.

where a digital billboard is viewed at the same time as other road features that require attention.

In a hypothetical scenario where a digital billboard is installed at a location offset to the left or right of the road corridor, the SISD guidance may be complied with if it relates to the direct distance from the billboard to a road feature, even if the billboard is still visible to drivers at the same time as other road features that require attention; potentially nullifying the intended risk mitigation of the guidance.

Council considers that it would be beneficial for the guidance to provide clarity on whether the separation distance is based on SISD between the two relative route-positions along the road of the billboard and the road feature or whether the SISD is intended to be applied to the direct distance between the billboard and the road feature.

In general, Council is supportive of implementing minimum safe separation distance between digital advertising billboards and particular road features to limit environmental complexity experienced by drivers, however, considers that further clarification should be provided in the guidance to more clearly demonstrate how the Austroads Safe Intersection Sight Distances (SISD) will be used for determining minimum safe separation distances to ensure the consistent application of the guidance across the network.

Dwell Time (Section 9.6)

Council is supportive of NZTA's stated goal of minimising the number of drivers who see an image change on a digital billboard as a change in image can increase distraction risk, and therefore agree that an appropriate dwell time for a digital sign will require a site-specific assessment from a suitably qualified professional.

Figure 4 in the consultation document provides guidance on which conditions at an installation site would warrant the addition of 10 seconds to the 10 second minimum dwell time. However, Council considers that the current guidance is not entirely clear whether non-compliance with SISD from any of the features in the bulleted list only constitutes one addition of 10 seconds, or if the dwell time is additive for every instance of non-compliance with SISD from a feature on the list. An example being, if the proposed installation site was within SISD of an intersection and the road section also had a high collective risk, Council considers it is unclear whether this would count as two non-compliances of an additional 10 seconds each (resulting in 30 seconds dwell time) or whether non-compliance is only counted once (resulting in 20 seconds dwell time).

Image Content and Display (Section 9.8)

Council considers that the opening sentence of Section 9.8.1 introduces unnecessary ambiguity through use of the word “should”, regarding the requirement that digital billboards must not give instructions that conflict with any traffic sign, traffic control device or traffic rule as required by Rule 3.2(5) or the Land Transport Rule: Traffic Control Devices 2004. Council considers a suitable alternative sentence could read:

“The digital billboard must not imitate traffic signs or any traffic control device (either wholly or partially), nor give instructions that conflict with any traffic sign, traffic control device or traffic rule.”

Council is supportive of NZTA's recommendations limiting the number of elements on digital billboards to minimise distraction risk.

Additional considerations

Existing digital billboards

Council considers that this proposed guidance intends to appropriately limit the risk of driver distraction from the installation of new digital advertising billboards, however, the consultation document doesn't provide mention on what process, if any, would be applied to limit the risk from existing digital advertising billboards visible from state highways.

Future change in road environment scenario

While the consultation document recommends minimum spacing requirements of digital billboards from particular road features, it is unclear how this would work in practice if, for example, a digital billboard was installed complying with SISD from nearby road features, but the RCA in the future identifies a need to install a traffic control device or road feature that would in turn result in non-compliant SISD from the digital billboard.

Sign size

As outlined in Section 2 of the consultation document, Council recognises that the proposed guidance should be read in conjunction with the *NZTA Planning Policy Manual: Third party signs on and visible from the state highway corridor*. Table 1 of this manual sets out best practice design principles for all signs, including size as described in the following reference:

“Signs should be at a scale appropriate to their context. This includes the speed zone, District Plan zoning and rules, and the surrounding environment.”

Council considers it beneficial to provide more explicit guidance on recommended sign sizes. Including this detail within Section 12 of the proposed guidance, under the topic *Display Characteristics*.

Conclusion

Council supports NZTA's desire to manage the installation of digital billboards to ensure that they are located and operated such that they do not adversely impact on the safe and efficient operation of the roading network.

We look forward to continued dialogue and partnership in this important area.

Further information

Should NZTA require clarification on the submission or any additional information, please contact Virendra Prasad on email Virendra.Prasad@waidc.govt.nz.

Ngaa mihi,



Aksel Bech
Mayor

Waikato District Council

Council Approval and Reference

This submission was approved by the Mayor and Committee Chairs as delegated in the Governance Structure on 13 November 2025.