

NZ Transport Agency Waka Kotahi Reference: Application: 2025-0957

June Cahill
Environmental Planning Authority
Private Bag 63002
Wellington 6140
New Zealand

Sent via Email: info@fasttrack.govt.nz

Dear June,

Draft decision and consent conditions for Drury Metropolitan Centre – Consolidated Stages 1 and 2 (FTAA-2502-1019)

Thank you for inviting NZ Transport Agency Waka Kotahi (NZTA) to comment on the draft decision and draft consent conditions for the above application. NZTA has no comment to make on the draft decision but makes the following comments and requests changes to some of the draft conditions.

Scope of the 'Transport Infrastructure Upgrades' conditions

It appears that there is an error in condition 85 as the condition refers to development which is not within the scope of this consent. The applicant has applied for 63,547m² gross floor area (GFA) of retail, in addition to other land uses, but the table in condition 85 includes up to 97,000m² of retail GFA. Similarly, as noted by the panel in its Minute 12, the table refers to 400 dwellings but this is greater than applied for in this consent. NZTA recommends that the table in this condition be amended to only refer to activities, and their scale, which relate to the consent.

References to the Waihoehoe Road / Great South Road intersection upgrade

The plan of the Waihoehoe Road / Great South Road intersection upgrade contained at Appendix 3 of the conditions has been superseded. The most recent plan is attached to this letter at **Appendix 1** and should be used instead. The reference to this project in the conditions is incorrect as it is referred to as an 'NZTA/RoRS Design'. This should instead be referred to as an 'AT/NZTA' design as this is a joint project as per the naming of the drawing in Appendix 3 of the conditions.

Signage Type G – LED Digital Screens

NZTA has extensive experience in assessing illuminated billboards and other signs on and close to the state highway network and has developed a standard set of conditions to manage their effects. Given the location of one of the proposed LED digital screens at the end of a motorway off-ramp where high speed traffic will be transitioning to a busy urban environment, there is a risk of adverse traffic effects if the operation of the sign is not managed through appropriate conditions. Various changes to the draft conditions are proposed at **Appendix 2**, with one of the most relevant ones being the change in dwell time from eight seconds to 30 seconds. Research shows that shorter dwell times are more likely to result in driver distraction as drivers are exposed to numerous changing images. Other changes are sought to ensure that:

- The detailed design of the screens do not have visible filament which can be a distraction to drivers;
- The text in images is clearly legible;
- The luminance of the signs during darkness is limited to avoid adverse glare effects on drivers;
- The luminance controls are correctly operating; and
- The Council is the decision maker in determining whether remedial actions are necessary in the event that the proposed signs cause adverse traffic effects.

If you have any queries regarding the above information, please feel free to contact the Environmental Planning team at environmentalplanning@nzta.govt.nz.

Yours sincerely,



Evan Keating

Planner

Poutiaki Taiao / Environmental Planning, System Design, on behalf of NZ Transport Agency Waka Kotahi.

Enclosed:

- Attachment 1: Plans of the Waihoehoe Road / Great South Road intersection
- Attachment 2: Revised Signage Type G – LED Digital Screens conditions

Attachment 1: Plans of the Waihoehoe Road / Great South Road intersection – see separate attachment

Attachment 2: Revised Signage Type G – LED Digital Screens conditions

Signage Type G – LED Digital Screens

Image Content

30A. Images displayed on the three LED digital screens (**LED screens**) approved on Lots B and D must be designed and operated to achieve the following:

- (a) The images displayed must not change rapidly with a dwell time of less than ~~eight~~ thirty (30) seconds for any separate display;
- (b) Each image must transition to the next message by way of a 0.5 second cross-dissolve;

(c) LED screen materials must be non-reflective to prevent any sunlight or headlight reflection;

~~(c)(d)~~ LED Screens must use LED technology that does not have the filament visible to motorists

~~(d)(e)~~ Image content must:

- (i) not be linked to “tell a story” across two or more sequential images (i.e., where the meaning of an image is dependent upon or encourages viewing of the immediately following image);
- (ii) be static, and not incorporate flashes, video, emissions, or other dynamic effects;
- (iii) not imitate traffic signs or any traffic control device (either wholly or partially), or give instructions to motorists that conflict with any traffic sign or traffic control device;
- (iv) not invite or direct a driver to take some sort of driving action; and
- (v) not be split to allow the display of two or more separate advertisements concurrently on the LED screens.

(f) Images displayed on the LED screens must directly relate to activities and businesses within Drury Metropolitan Centre only and must not be used to advertise any business, service, goods and products, activities or events that are not directly related to the primary use or activities occurring on the site of the LED screens.

(g) At all times the digital billboard should include no more than ten individual elements; of which words may only make up eight elements. Additionally, each line of text shall contain a maximum of 40 characters.

For interpretation purposes an element refers to each individual item which includes:

- [i. Every word used](#)
- [ii. An email](#)
- [iii. A phone number.](#)
- [iv. A picture.](#)
- [v. A symbol](#)
- [-vi. Any other individual element](#)

Luminance

30B. The luminance of the LED screens must not exceed the following:

- (a) Outside of daylight hours (dusk to dawn), the maximum luminance of any part of the LED screens shall not exceed [1250](#) cd/m²; and
- (b) During daylight hours (dawn to dusk) the maximum luminance of any part of the LED screens shall not exceed 5,000 cd/m². The method of luminance shall be LED display only, with no external illumination.

30C. The luminance level of the LED screens during daylight hours must vary to be consistent with the level of ambient light and ensure that the LED screens are not significantly brighter than the ambient light level and is only illuminated to the extent necessary to ensure that the LED screens are legible. To achieve this, the brightness of the LED screens must be automatically controlled with in-built detectors/sensors.

30D. The Consent Holder must monitor and record the maximum 'intensity' of the LED screens produced as a result of the automation required by Condition 30B following the commencement of the display of images to certify that the luminance of the LED screens is in accordance with Conditions 30B and 30C.

30E. The Consent Holder must monitor and record the maximum 'intensity' of the LED screens produced as a result of the automation required by Condition 30A following the commencement of the display of images to certify that the luminance of the LED screens is in accordance with Conditions 30B and 30C. To undertake the work required by this condition, the Consent Holder must engage an independent lighting practitioner to record and confirm luminance readings of the LED screens on a minimum of three occasions, including:

- (a) one recording at midday;
- (b) one recording during the hours of darkness; and
- (c) one recording during the morning or early evening.

30F. The monitoring must be undertaken over a six-month period following the installation and operation of the LED screens. This random testing shall be undertaken at least four times and at regular intervals during the six-month

period.

- 30G. The Consent Holder must submit a luminance certification report to the Council within thirty working days following the commencement of the display of images on the LED screens.

Malfunctions

- 30H. The LED screens must be programmed to automatically and instantaneously go dark in the event of a malfunction. The Consent Holder must provide an emergency (24/7) contact number and an intervention process to enable the Consent Holder to disable the LED screens by manual intervention, both remote and on-site, should the automatic intervention fail. These details must be provided to the satisfaction of the Council's Compliance Monitoring Officer prior to operation of the digital signs.

Monitoring

- 30I. Within 30 days of the LED digital sign being put into service the Consent Holder shall submit a report from a suitably qualified and experienced practitioner, to the satisfaction of the Council's Compliance Monitoring Officer, confirming the following

- i. The automatic dimming system provides the functionality defined in Condition 30C for day, dawn, dusk and night conditions in the form of luminance readings taken approximately 20m from the sign;
- ii. The suitability for providing acceptable readability during day, dawn and dusk and night situations;
- iii. There is no disability glare to motorist during both day and night.
- iv. Luminance readings between image displays change by less than 30% from one image to another

- 30J The Consent Holder must engage a suitably qualified and experienced traffic engineer ~~42~~six months from commencement of operation of the LED screens and on an ongoing basis every two years from the date the LED screens became operational to review:

- (a) The NZTA Crash Analysis System for all recorded crashes within 100m of the LED screens, with particular reference to any crashes where the traffic crash report makes any reference to the LED screens. The review must identify and analyse the crashes to determine whether any crashes may be reasonably related to the operation of the LED screens.
- (b) Any complaints raised by a member of the public with respect to pedestrian and/or driver safety being adversely affected by the presence of the LED screens that are received by the Council and advised to the Consent Holder.

The Consent Holder's traffic engineer must then prepare a report containing the analysis undertaken in accordance with (a) and (b) above and this report must be submitted to the Council within 20 working days of the ~~42~~six-month

anniversary of the installation of the LED screens.

30KJ. If the review(s) required under Condition 30I identify any crashes that, in the professional opinion of the Consent Holder's traffic engineer, are or may be related to the operation of the LED screens, the Consent Holder must:

- (a) submit to the Council a report from a suitably qualified and experienced traffic engineer, identifying any measures that are considered reasonably necessary to remedy or mitigate those identified road safety effects;
- (b) As soon as reasonably practicable thereafter, discuss the measures identified in the report with the Council with a view to reaching an agreement on any remedial or mitigation measures that may be reasonably necessary; and
- (c) Implement f such measures ~~are agreed between the Consent Holder and determined by the Council, and certified by the Council as acceptable, these measures must be implemented by the Consent Holder.~~

Advice note: In reviewing the monitoring conditions (30I-30K), the Council should consult with Waka Kotahi NZ Transport Agency Environmental Planning Team via Environmentalplanning@nzta.govt.nz.