

Subject: Drury Metropolitan Centre Fast Track Application
E23 Signs Review

Ref: A24001

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Background

CKL has been engaged by Kiwi Property Holdings No 2 Limited to assess the potential traffic and pedestrian safety effects of the proposed signage within the Drury Metropolitan Centre in response to item 36 of the Auckland Council Information Requests. The information request reads (emphasis added):

“Section 6.2.1 of the AEE and Appendix 6 to the AEE provide details on Comprehensive development signage, and draft Condition 30 requires that detailed information must be provided to Council before installation. The ITA has not assessed the potential traffic and pedestrian safety effects of the proposed signage. We recommend that the applicant provide an assessment against E23.8.2.(2)(b) and (c).”

Pursuant to Section J of the Auckland Unitary Plan (“AUP”), “Comprehensive development signage” has “the same meaning as in the Auckland Transport, Auckland Council Signage Bylaw 2015”. The bylaw’s definition reads, “signage relating to a new building or the alteration of an existing building where the building or alteration requires a resource consent and/or building work to the value of at least \$100,000.”

Accordingly, this report considers only signage attached to building facades and in a free-standing pylon relating to retail, entertainment and commercial activities that are to be undertaken within the Centre. It excludes:

- Wayfaring signage that assists visitors to navigate the Centre; and
- Any signage (e.g.: billboard) that advertises products or services not directly related to activities in the Centre, for which separate consent is needed.

Pursuant to Rule E23.4.2(A53), the comprehensive development signage associated with Drury Centre is a restricted discretionary activity.

Rules E23.8.2(b) and (c) of the AUP are relevant assessment criteria and read (emphasis added):

“(2) lighting and traffic and pedestrian safety: ...

(b) the degree of compliance with Standards E23.6.1(2)(a),(b),(c) or E23.6.1(3)(a), (b), (c) and whether lighting levels, light spill or glare from illuminated or, changeable message signs or

billboards that do not meet these standards will cause unreasonable levels of glare and discomfort to any person or to traffic safety (the controls of Tables 2.1 and 2.2 of Australian Standards AS 4282 - 1997 (Control of the Obtrusive Effects of Outdoor Lighting) may be used to determine glare and discomfort);

(c) whether there will be adverse effects on the amenity values of the surrounding area and traffic or pedestrian safety from signs or billboards that are capable of displaying variable images more than once every eight seconds, taking into account: (i) the proposed transition time between images; (ii) the dwell time of each image; (iii) the number of image changes per hour; and (iv) the number of consecutive related images."














The criteria require consideration of effects on both amenity values and traffic or pedestrian safety. Potential effects on amenity values are addressed in para 11.4.3.7 of the AEE filed in support of the application.

Comprehensive development signage is generally required to adhere to the requirements of the Road Controlling Authority (RCA) and secondary affected authorities. Such requirements are commonly adapted from the Waka Kotahi Traffic Control Devices Manual (TCDM) Part 3: Advertising Signs (discussed below).

Proposal

A total of 13 Signage typologies are proposed within the Metropolitan Centre of Drury:

1. Type A – Shopfront
2. Type B – Box Canopy
3. Type C – High Level Box Shape
4. Type D – Steel Under Canopy
5. Type E – Blade Sign
6. Type F – Backlit Lettering
7. Type G – Curved LED Screen
8. Type H – Pylon Sign, including LED elements/screens
9. Type J - Ground Sign
10. Type K – Small Building Sign
11. Type L - Medium Building Sign
12. Type M - Large Building Sign
13. Type N – Under Canopy Hung

RETAIL SIGNAGE KEY:	
TYPE A - SHOPFRONT	
TYPE B - BOX CANOPY	
TYPE C - HIGH LEVEL BOX SHADE	
TYPE D - STEEL UNDER CANOPY	
TYPE E - BLADE SIGN	
TYPE F - BACKLIT LETTERING	
TYPE G - CURVED LED SCREEN	
TYPE H - PYLON	
TYPE J - GROUND SIGN	
TYPE K - SMALL BUILDING SIGN	
TYPE L - MEDIUM BUILDING SIGN	
TYPE M - LARGE BUILDING SIGN	
TYPE N - UNDER CANOPY HUNG	

The architectural plans (Appendix 6 to the AEE for the application) demonstrate the design of proposed signage across the development. They also include signage plans for each of the proposed Lots A-E. This has established a clear signage strategy which will be integrated into the overall façade designs.

Content for the signage is yet to developed but is expected to feature the name or logo (or both) of retailers or service providers occupying the relevant building. With regard to the signage types:

- With the exception of Type H pylons located in Lots A, C and D, the signage is integrated into the building facades.
- Only the Type H pylons and two Type G curved LED screens (located on the southeastern corner of Lot B and the northwestern corner of Lot D) will use changing images.
- Signage Types A-F will include back lighting.
- Signage Types J-N will not include any backlighting.

Given that the signage is generally integrated into the building facades, in practice it is only the pylon and LED screens that could potentially generate adverse traffic or pedestrian safety effects. The balance of this report addresses those signage types.

The proposed **Type H pylon signage** includes a 'signage zone' with a LED screen that will display advertisement/directional signage related to the local businesses. The design of the pylon signage is shown below in **Figure 1**.

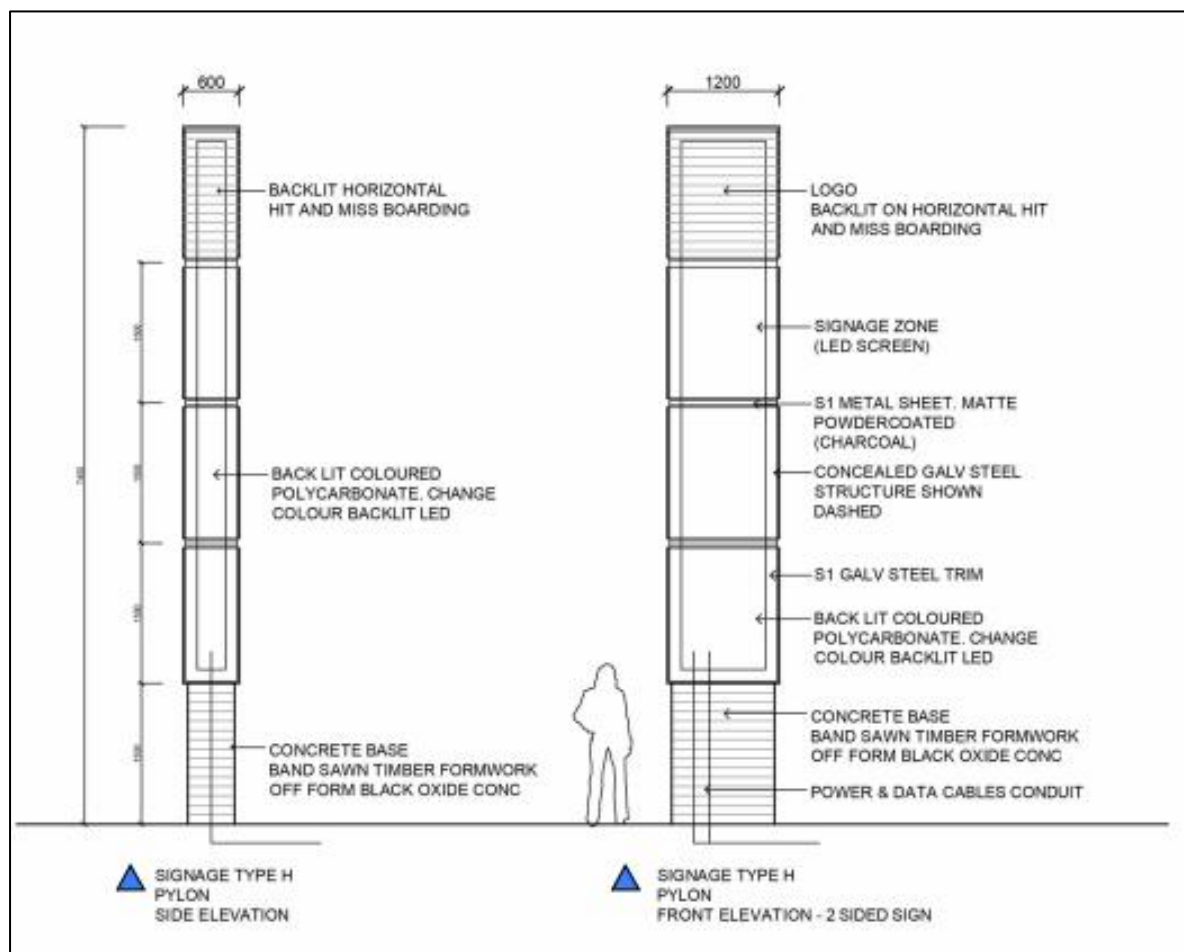


Figure 1 Pylon Design Type H Signage Design

The two **Type G curved LED screens** are proposed at visually prominent corners. They will each be erected on carparking buildings and will be contained within the building façade. They will adjoin and curve around the vehicle ramps located on the building corners, matching the façade and are proposed to be located approximately 3.0m from the ground and will display

advertisement/directional signage related to the local businesses. The design of the curved LED screens is shown in Figure 2.

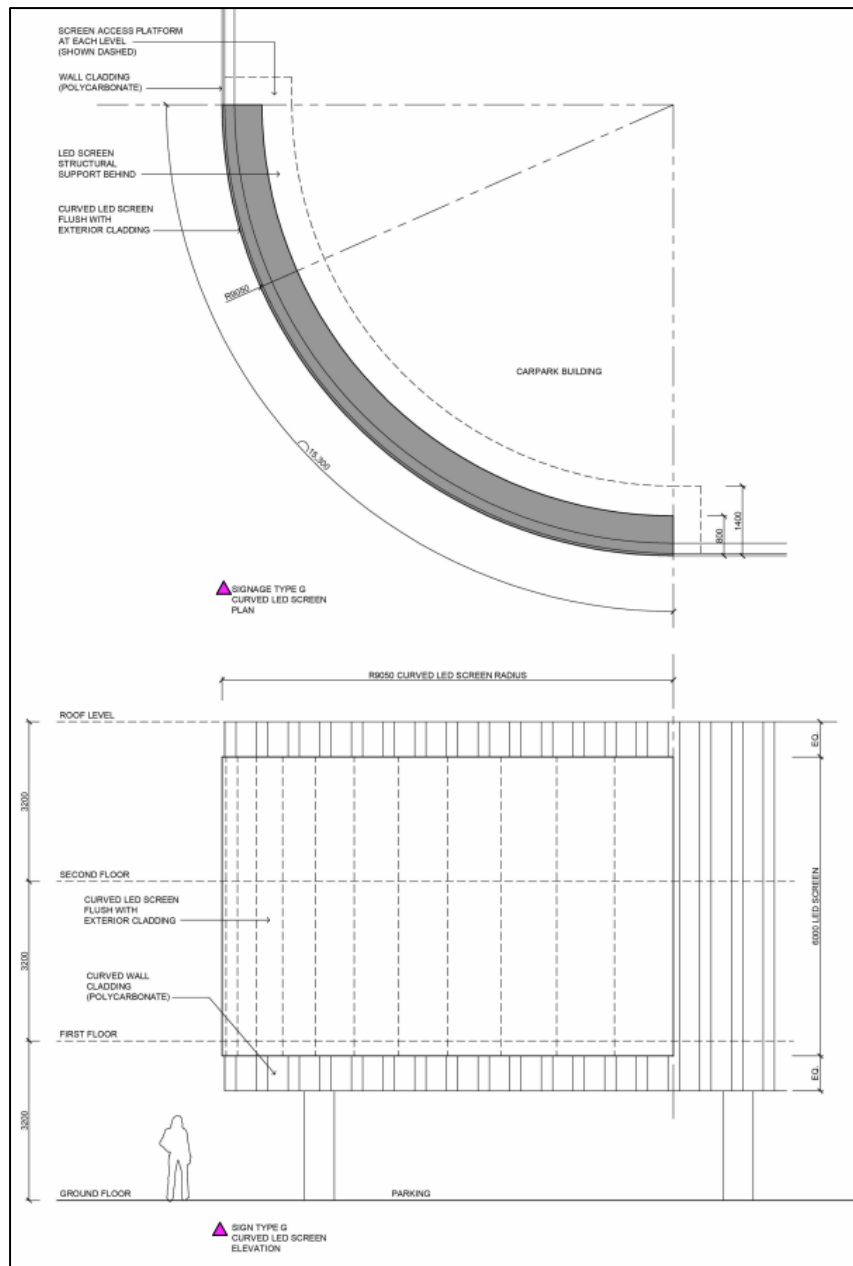


Figure 2 Proposed LED Screen – Type G Signage Design

The proposed LED screens will be visible from Road 2 (Lot D) and the Road 25/ 1 signalised intersection (Lot B), identified in Figure 4 and Figure 3 respectively.



Figure 3 Lot D LED Screen

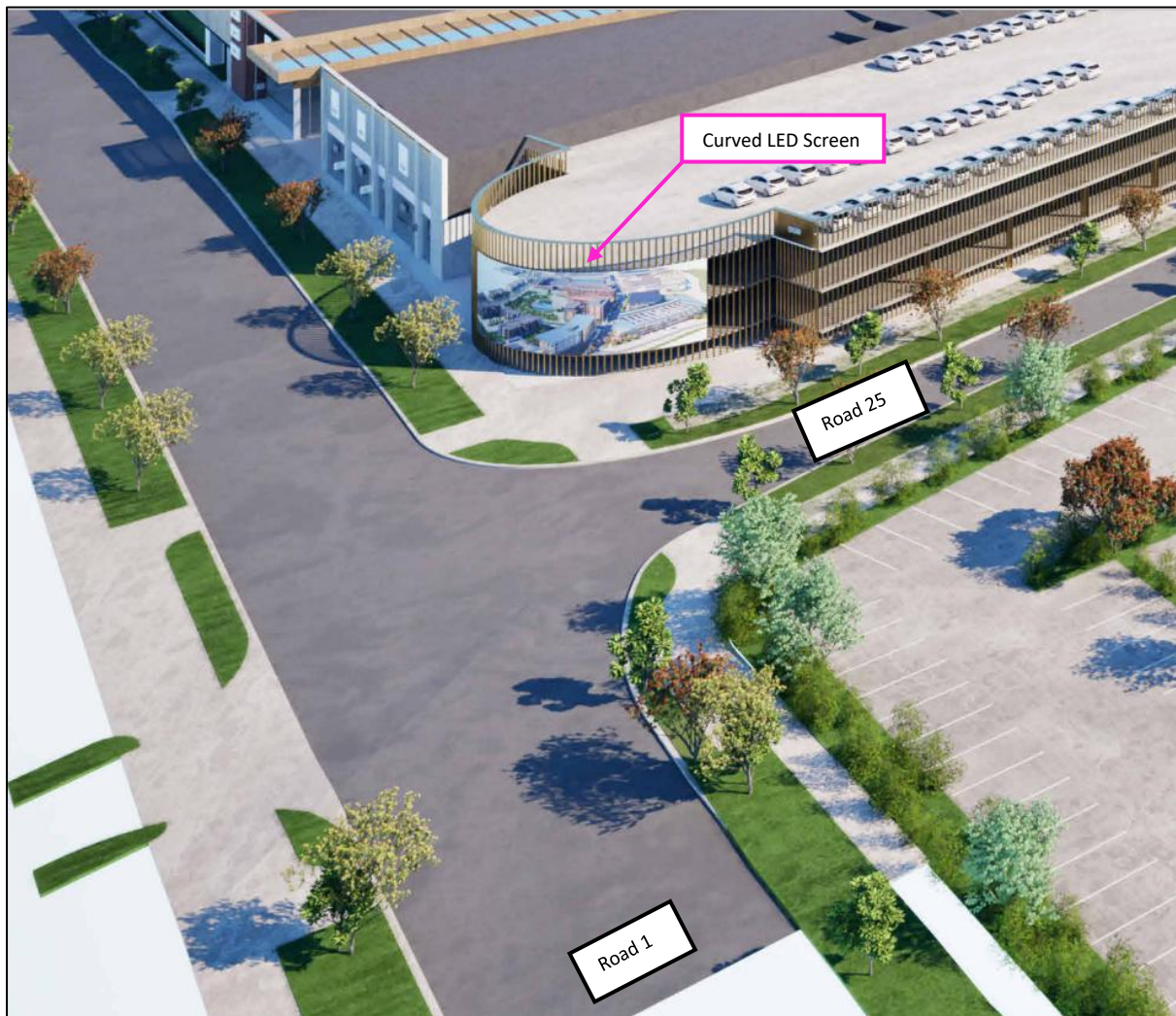


Figure 4 Lot B LED Screen

LED signage has been present in Auckland for many years and standard methodologies have been adopted, secured where necessary by condition, to ensure appropriate and acceptable levels of traffic and pedestrian safety. These include the following measures that are to be implemented at Drury Centre for the LEC components of the pylons and the curved LED screens:

- Images shall have a minimum dwell time of eight seconds.
- Images shall transition from one to the next via a 0.5 second dissolve.
- Image content shall be static, and shall not incorporate flashes, movement, animation or other dynamic effects.
- Images shall not use graphics, colours, or shapes in combination in such a way that they would resemble or cause confusion with an adjacent traffic control device.
- Images shall not invite or direct a driver to take some sort of driving action.
- Images on the billboard shall 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).

With regard to digital displays:

- The luminance level of the digital display during daylight hours shall vary to be consistent with the level of ambient light and ensure that the digital display is not significantly brighter than the ambient light and is only illuminated to the extent necessary to ensure it is legible. [Nb: To achieve this, the brightness of the display shall be automatically controlled with an in-built light detector / sensor.]
- The luminance of the digital display units shall not exceed the following:
 - Outside of daylight hours (dusk to dawn) the maximum luminance of any part of the sign shall not exceed 350cds/m²; and
 - During daylight hours (dawn to dusk) the maximum luminance of any part of the sign shall not exceed 800cds/m².

Assessment against Rules E23.8.2(b) and (c)

Rule E23.8.2(b) requires, first, consideration of the degree of compliance with Standards E23.6.1(2)(a), (b), (c) or E23.6.1(3)(a), (b), (c). The signage will be designed and installed to comply with these standards. That is the proposal will comply in full with the relevant performance standards.

Rule E23.8.2(b) requires, secondly, consideration of “*whether lighting levels, light spill or glare from illuminated or, changeable message signs or billboards that do not meet these standards will cause unreasonable levels of glare and discomfort to any person or to traffic safety*”. This provision is ambiguous. It is unclear whether the criterion applies to all “*illuminated or changeable message signs*” or only those that “*do not meet [the] standards*”. In any event, the proposed pylons and curved LED signs will not cause unreasonable levels of glare or discomfort for drivers or in terms of traffic safety:

- The signs will incorporate the performance characteristics listed above and will comply with all relevant illumination and lighting standards.
- The signs will all be located within a low-speed traffic environment and will form part of an intensively developed and well-lit urban location where they will not stand out.
- The signs will all comply with Tables 2.1 and 2.2 of Australian Standards AS 4282 - 1997 (Control of the Obtrusive Effects of Outdoor Lighting) referred to in the criterion.

Rule E23.8.2(c) requires consideration of “*whether there will be adverse effects on ... traffic or pedestrian safety from signs or billboards that are capable of displaying variable images more than once every eight seconds.*” As recorded above, it is proposed that the LED images shall have a minimum dwell time of eight seconds so this criterion will not be activated by the proposal. Furthermore, the other proposed performance constraints (recorded above) will ensure that any potential effects will be avoided or minimised.

Waka Kotahi TCDM Part 3

Waka Kotahi TCDM Part 3 outlines the general requirements for advertising signage along State Highways or any road corridor within a Waka Kotahi designation. This information includes but is not limited to illumination standards, minimum forward sight distance, spacing between signs and safe

intersection sight distance (where applicable). It is noted that although the information contained within this document is typically applied to Waka Kotahi road networks, it is also regularly adopted by local Councils and RCA's as a guideline document (and is not a requirement). The provisions are relevant to the curved LED signs.

Lot D that will be seen via Road 2 as this is an extension of the motorway off-ramp that is owned by Waka Kotahi. Lot B will be seen at the Road 25/Road 1 intersection.

In regards to Lot D, the proposed signage complies with the requirements of the Waka Kotahi TCDM3 and the relevant assessment criteria given its distance from the motorway and location within the Metropolitan Centre.

In regards to Lot B, the proposed signage aligns with the requirements of the Waka Kotahi TCDM3, except in relation to the proximity to intersections. The Auckland Unitary Plan does not specify minimum distances between signage and intersections. However, the Waka Kotahi TCDM provides guidance recommending 100m separation between advertising signs and any traffic control devices, including signals or signs. While not mandatory, this buffer aims to reduce the likelihood of visual conflict.

In this urban context, strict application of the 100m separation is impractical given that urban block lengths are often <200m. The proposed signage design and recommended operational controls address the underlying concerns that motivate the TCDM guidance (i.e. minimising visual competition with road signs and ensuring safe driver attention).

Furthermore, there are many LED screens/billboards located within signalised intersections that have been established without causing road safety issues, demonstrating that they are not inherently unsafe. The following digital billboards are located at intersections:

1. 2-8 Beach Road, Auckland CBD accommodates a curved LED screen facing the Beach Road/Anzac Avenue intersection.
2. 125 Queen Street, CBD situated at the intersection with Shortland Street.
3. 1 Exmouth Street, Eden Terrace situated at the Exmouth Street/Newton Road intersection.
4. 6 Pitt Street, Auckland Central, situated at the intersection with Hobson Street.
5. 778-802 Great North Road, Auckland – Great North Road and the North-western Motorway on- and off-ramp intersection.
6. 135 Wairau Road, Wairau Valley situated at the northern corner of the Wairau/Tristram Intersection.

There are further countless other LED screens located at intersections within Auckland.

Examples numbered 5 and 6 were notified and the associated traffic reports showed that the proposed digital billboards did not obstruct visibility of traffic signals, signs, or approaching vehicles, and were unlikely to increase driver distraction to a degree that would affect decision-making at intersections. Commissioners accepted that, with appropriate design controls (such as brightness limits and static image timing), the billboards would not materially impact the safe operation of nearby intersections.

Subject to alignment with the above recommendations, the proposed signage is not expected to result in adverse traffic safety outcomes. It is consistent with accepted safety research and urban design realities, and achieves a reasonable balance between visibility and legibility.

Conclusion

Subject to compliance with the standard operational parameters listed above for the LED components of the pylon signs and for the curved LED screens, the proposed signage will not generate adverse effects on road traffic or pedestrian safety.

CKL