

Before a Commissioner
Appointed by the Christchurch City
Council

Under the Resource Management Act 1991

In the matter of a resource consent application for a free standing digital
billboard at 235 Manchester Street (RMA/2020/1877)

Closing legal submissions on behalf of Wilson Parking Limited

18 March 2022

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**anderson
lloyd.**

May it please the Commissioner

- 1 These submissions are presented on behalf of Wilson Parking Limited (**Wilson Parking, the Applicant**) in relation to its application for land use consent to erect a double-sided freestanding 18m² LED digital billboard¹ (**Billboard**) at 235 Manchester Street (**the site**) (RMA/2020/1877).
- 2 A reply is provided in relation to the following matters raised throughout the hearing:
 - (a) Traffic effects;
 - (b) The environment;
 - (c) Submitter concerns;
 - (d) Amendments to the Billboard and other matters; and
 - (e) Conditions of consent.

Traffic effects

Traffic Signal Pole 5 Overlap

- 3 It appears to be common ground amongst the experts that the single area of disagreement is the effects of the overlap of the Billboard and Traffic Signal Pole 5.
- 4 Mr Downard-Wilke agrees there is no visual overlap of Traffic Signal Pole 5 for southbound drivers in the general traffic lane within the critical decision zone, where drivers must decide whether to stop or not. Rather he confirms that the overlap is in the kerbside lane.² So the issue in debate is solely the overlap between one signal pole and one side of the Billboard over the very short distance at, or just before, the Approach Site Distance, and for drivers in the kerbside traffic lane only.
- 5 Ms Brown has relied on Mr Downard–Wilke's opinion, that this overlap would cause drivers to be so fixated on the Billboard they would disregard all other traffic signals and focus on Traffic Signal Pole 5, as demonstrating a potential effect of low probability which has a high potential impact.³

¹ The size of the Billboard was reduced to 18m² from 36m² with the removal of the green frame at the hearing

² Mr Axel Downard-Wilke's notes on Andy Carr in response to his paragraph 73

³ Section 3(f) of the Resource Management Act 1991

- 6 As stated in my opening, there is an evidential burden on all parties, including council officers, to produce evidence tending to support an allegation. In terms of traffic safety it is important to bear in mind that a change to a potential road safety risk does not necessarily manifest in any adverse effect. There is no quantifiable evidence before you that points to an increased risk to the safety of road users arising from the proposed Billboard. Mere speculation is not sufficient.
- 7 The often cited case on this section 3(f) of the RMA is *Shirley Primary School v Christchurch City Council*⁴ where resource consent was sought to establish a cellular radio base station adjacent to Shirley Primary School and there were concerns regarding the effects of radio frequency radiation (RFR) on human health. The Environment Court had to decide whether the risk was acceptable. The Court held:

[106] Since life cannot be made completely safe for anybody, a no risk approach is (logically) impossible. There is also authority that the RMA is not a 'no risk' statute and therefore it is not the role of this Court to ensure that Telecom's cell site can operate with absolute safety. ...

[107] Of course as soon as we say we cannot be sure there is no risk from RF radiation from the cell sites the reaction is sure to be that means there is a risk, and therefore children at the school should not be exposed to it. But it is extremely important to realise that the second part of that sentence does not follow from the first. The risk may be so very small it is acceptable, compared with other risks parents expose their children to daily, and that is what we are to assess."

- 8 When considering section 3(f) and the evidence required to assess risk, the Court found that:

"To fall within section 3(f) of the act as a potential effect of low probability and high potential impact an effect must not be simply an hypothesis: there must be some evidence supporting the hypothesis. This evidence may consist of at least one of:

(1) consistent sound statistical [footnote omitted] studies of a human population; or

(2) general expert acceptance of a hypothesis; or

(3) persuasive animal studies or other bio-mechanistic evidence accompanied by an explanation as to why there is no epidemiological evidence of actual effects in the real world; or

⁴ [1999] NZRMA 66.

(4) (possibly) a very persuasive expert opinion.

It is important that the evidence need only fall into one of the categories before the Court will take it into account..."

- 9 The Court in *Shirley Primary School* further held that section 3(f) should be based on a threshold of "real risk":

"[193] In the end we find all the expert psychological evidence unhelpful. We had direct evidence about people's fears of exposure to RFR from enough parents and teachers to be sure that a significant part of the school community is genuinely concerned about, even fearful of, the effects. But whether it is expert evidence or direct evidence of such fears, we have found that such fears **can only be given weight if they are reasonably based on real risk.**"

[Emphasis added]

- 10 In our submission, the Council's concerns do not meet the threshold of "real risk".
- 11 The likelihood of all the factors Mr Downard-Wilke described as occurring simultaneously is remote, but even in the unlikely event that they did all occur, it is submitted it would not result in a high potential impact. Manchester Street is a collector road, meaning lower volumes of traffic are present and it has a lower speed limit of 30 km/h. In the unlikely event, that a crash did occur (as a result of the overlap between the Billboard and Traffic Signal Pole 5) there was no evidence presented to suggest that injury, serious or otherwise, would follow.
- 12 Mr Downard-Wilke did not provide evidence of any crash in the country that has been attributed to a digital billboard, or that an increase in crash numbers or crash rates occurs when digital billboards are installed. In terms of an elevated crash risk, his referral to the George Bolt Memorial Drive after the billboard was installed has only demonstrated a decline in crashes (addressed later in these submissions).
- 13 Conversely, the Applicant's evidence demonstrates that the proposed Billboard does not pose a real risk, subject to the proposed conditions of consent. It is therefore submitted that the traffic effects are acceptable.

Mr Downard–Wilke

- 14 Mr Downard–Wilke provided extensive rebuttal to Mr Carr's evidence at the hearing. He raised concerns regarding colour-blind drivers; underreporting in crash data; and illegal driving manoeuvres. It is submitted that a large proportion of those comments lacked an evidential basis. I address these briefly below:

Colour Blindness

- 15 Mr Downard-Wilke discussed colour blindness in some detail. His concerns were based around a scenario of the change in image of the digital Billboard theoretically being "in sync" with the traffic signal, and colour-blind drivers would fail to differentiate between the traffic signal and the Billboard. However, the proposed conditions make it clear that the image on the Billboard changes over a 0.5 second dissolve, whereas traffic light signals change from one colour to another instantaneously. It is submitted that the traffic signal and the Billboard cannot be in sync in the manner Mr Downard-Wilke suggests.

Crash data

- 16 Mr Carr stated at the hearing he had been unable to find any crashes in the Waka Kotahi Crash Analysis System where digital billboard distractions had been cited as a contributing factor, or that when digital billboards are installed, crash rates increased. Mr Downard-Wilke suggested one reason for this is that drivers might be reluctant to state they were distracted by a billboard, especially if they thought they might be prosecuted for the crash.
- 17 As Mr Downard-Wilke did not raise this matter prior to the hearing, Mr Carr was not able to respond to the issue specifically at the time. Accordingly, he has subsequently advised that there are two reasons why Mr Downard-Wilke's line of thinking is incorrect. Firstly, even if a driver does not admit that a digital billboard has distracted them, the crash will still be recorded and so if digital billboards are indeed distracting, the number of crashes will increase. Such an increase is not observed, as set out in the application documents. Secondly, there has been a research study into whether drivers report crashes where they were distracted by a billboard. Mr Carr specifically advises that:

In 2009, a study was carried out in Sweden of over 4,300 drivers who had been involved in a crash in the previous 12 months. The drivers filled in a web-based questionnaire about distractions during the crash. For each of the potential 13 distraction factors presented, the drivers indicated whether or not they were distracted by that specific factor at the time of the crash. 'Distracted by billboard' was one factor of the 13. The study reported:

"Even though the results from this study indicate that looking at billboards and searching for addresses/street names are the distractions associated with highest accident risk, it is also important to look at the prevalence of the risk factor. These two factors were reported to have been distracting only 0.3 and 0.6 percent of drivers (i.e., in the whole sample) respectively. This means that, as measured by the rate to which billboards distract drivers, this is not a large risk factor from a population perspective.

When considering the prevalence of the risk factors in addition to the relative accident involvement, talking with passenger(s) and attending to children in the back seat are the distraction factors that perhaps are most likely to make the largest contributions to the number of crashes.⁵

Illegal manoeuvre

- 18 Mr Downard-Wilke raised concerns with drivers travelling in the kerbside lane, one of these involved an illegal manoeuvre. This occurred when drivers seeking to go through the intersection did so via the kerbside lane to avoid cars waiting to turn right in the other lane.
- 19 Mr Harries advised at the hearing that drivers are alerted to the illegal manoeuvre by a sign stating "*Left lane for left turn except buses.*"
- 20 An illegal move is not a relevant RMA consideration, nor is it for the Applicant to address perceived flaws in the roading layout.

George Bolt Memorial Drive billboard

- 21 At the hearing Mr Downard-Wilke provided extensive commentary on the George Bolt Memorial Drive billboard location (where there was an overlap present at the Approach Sight Distance⁶) and advised that there had been 8 crashes recorded since the billboard became operational in December 2013. In the application, Mr Carr noted that there had been 19 crashes recorded in the 5 years prior to installation of the billboard. In other words, the crash rate has reduced from 3.8 crashes per year prior to the billboard installation, to 1 crash per year following installation. This is a location with higher traffic flows and vehicle speeds than Manchester Street, yet crashes have reduced since the billboard installation. Accordingly, there is no evidence before you to suggest that the Billboard will increase traffic safety effects (based on this example) as suggested.

⁵ Study: Backer-Grøndahl, A., & Sagberg, F. (2009). "Relative crash involvement risk associated with different sources of driver distraction." Presented at the First international Conference on Driver Distraction and Inattention. Gothenburg, Sweden: Chalmers University

⁶ All 3 transport experts confirmed this is the point when a driver is so close to the intersection that even if the traffic signals change, the driver will not stop.

The environment

- 22 In my opening, I set out a real world approach to assessing the environment. This approach builds on the *Hawthorn*⁷ criteria and requires consideration of the likely future state of the environment under the District Plan. It is against this environment that the Billboard should be correctly assessed.
- 23 The Council appear to accept this argument, and the need to ensure an artificial consideration of the effects of the Billboard does not occur. However, the Council experts are selective in their application of this approach to support their recommendation to decline consent.
- 24 For example, the Council considers the effects of the Billboard on the future development of the site at 192 Gloucester Street, which is accepted will be largely residential under either Designation–V4⁸ or to a lesser extent under the Central City Commercial Business Zone (**CCCBZ**). However, Council fails to consider that in the future the application site and its immediate surrounds are also likely to be developed in accordance with the CCCBZ, rather Council assessment continues to consider the site as only a carpark. This is inappropriate as it has a limited consent term and what is required is a "real world" assessment against the outcomes sought by the District Plan. Mr Compton-Moen has undertaken this "real world" assessment, and considers the effects of the Billboard can be readily absorbed into this environment.⁹ Mr Compton-Moen observed that even since his Graphic Supplement photos were taken in 2020 the view has changed and will continue to change, and that the viewsheds will get smaller and smaller over time as the sign is viewed against a developing city centre .
- 25 This is a commercial zone, Designation–V4 has no special amenity outcomes over other CCCBZ land specified in the District Plan. When viewing the Central City Planning Map in the Christchurch District Plan it is evident there is a limited amount of CCCBZ land. The CCCBZ land runs either side of (and under) the Designation-V4 which stretches most of the length of Manchester Street in this zone and is not an "edge" to the residential zones as suggested by Mr Nicholson. The zone was created to constrain the location of the commercial core not prevent its development.
- 26 Further there was no evidence provided by Council that would *in reality* distinguish this area and take it out of the generality of the CCCBZ land. In response to a

⁷ *Queenstown Lakes District Council v Hawthorn Estate Limited* [2006] 12 ELRNZ 299, at [84]

⁸ If Council grant the 5 year extension sought by Ōtākaro Limited

⁹ Statement of Evidence of Mr David Compton-Moen at [27]

question from the Commissioner, Mr Compton-Moen accepted there is "nice landscape planting and a bus stop, but that its functional purpose is as a movement corridor". He considered "some commercial activity was starting to give it more vibrancy", but that "in terms of high quality environment, a lot of its quality is as it has been recently done and not because it is a stand-out high quality environment". Reference was made to the true high quality environments of Oxford Terrace and the City Promenade/river corridor.

- 27 It is understood that Williams Corporation intends to build apartment blocks and townhouses in the East Frame¹⁰ covered by Designation – V4. If this transpires, future residents will purchase these properties in the knowledge that they are locating in an environment which is a large scale, busy central city commercial area where amenity expectations are less. This is the correct approach under the RMA.
- 28 Council have agreed this is not a sensitive location and that the site is located within a commercial context.¹¹ However, Council is effectively requesting the Commissioner to disregard the plan provisions for the CCCBZ in favour of the potential for a residential development outcome and providing a level of amenity for those residents that is on par with a residential zone. Mr Nicholson considered that long term tenancies in the Quest Serviced Apartments and the Heritage Hotel Units could be considered residential activities¹². However, the definition of "residential activities" in the District Plan specifically excludes guest accommodation.
- 29 Yes, the District Plan does provide for future residential activities in the CCCBZ but it does not allow for them to be considered as sensitive activities but rather as a part of the broader large scale central city commercial environment. To read the Plan in this way could effectively "sterilise" prime central city business land from development anticipated under the District Plan and have implications for CCCBZ activities beyond this application.
- 30 It is this flawed assessment by Council that skews Ms Brown's assessment to find the Billboard will be prominent and dominant in the context of freestanding and built form. It is submitted, a prominent sign does not automatically default to being an adverse effect. Ms Brown's view of "enhance the central city" seems to be constrained to aesthetic enhancement. Whereas Ms Collie considered

¹⁰ <https://www.stuff.co.nz/the-press/news/127907537/williams-corp-to-build-sixstorey-apartment-blocks-and-townhouses-in-east-frame> (published on 28 February 2022 at 5pm)

¹¹ Summary of s42A Report of Ms Georgia Brown at [12] and [29] respectively

¹²Statement of Evidence, paragraph 7.7

enhancement in the round to cover a broader range of effects¹³ in the context of the District Plan.

- 31 When being questioned Mr Nicholson stated "*It is important to stress. The most important element is what the plan is directing us. I'm trying to implement the plan. The plan is saying that there are adverse effects.*" With respect, Mr Nicholson aspirations for the area to be of a higher standard of amenity enjoyed by future residential activity is not reflected in the underlying zone, nor has this materialised yet under the largely undeveloped designation. There are no upper limits on sign size in the District Plan nor are there any sensitive activities adjacent to the site. This was addressed extensively in the Applicant's planning evidence.
- 32 Mr Compton-Moen's images demonstrate that the Billboard is appropriate in the commercial context,¹⁴ and he discusses the appropriateness of signage in commercial areas, public transport interchanges (and the transitory nature of the recipients. It is submitted this is similar to the environment for this application.¹⁵ In response to the Commissioner's question, Mr Nicholson accepted that commercial activity is proposed for Manchester Street.
- 33 What is required, is a "real world" assessment of the development that is likely to occur under the District Plan, in the context of the site and its surroundings. If this is undertaken, the environment against which the Commissioner is considering the Billboard is a "*highly urban, well lit, busy commercial environment.*"¹⁶ It will include further intensification, large commercial buildings, mixed use development with residential components, public transport, signage, lighting and infrastructure, and in my submission is an appropriate location for the Billboard.

¹³ Statement of Evidence of Ms Anita Collie at [132] "*I agree that this sign will provide additional development, income, visual interest, vibrancy and activity, and thus contributes to enhancing the Central City as the primary commercial centre in the District.*"

¹⁴ Statement of Evidence of Mr David Compton-Moen at Appendix 1, Images 5a, 5b and 5c located on pages 15-17 of the Graphic Attachment

¹⁵ Statement of Evidence of Mr David Compton-Moen at [34] and Appendix 1, page 4

¹⁶ Statement of Evidence of Ms Anita Collie at [48(b)]

Submitter concerns

- 34 Ms McAra raised concerns at the hearing focusing on her perceived impact of the Billboard on mental health generally. Whilst genuine, it is submitted that some of her aspirations for the environment lack reality.¹⁷
- 35 Ms McAra discussed a 2013 Swedish article in support of her view.¹⁸ Mr Carr also examined this study¹⁹ and noted its artificial nature, given the drivers were being directed by a researcher in the car where to drive. However, most relevantly the roading environment in which this study was completed (a three lane motorway with heavy traffic with speeds in excess of 50 kilometres per hour) is extremely different to the environment being considered here.
- 36 It is submitted that Ms McAra's concerns about billboards generally are more appropriately addressed in the district plan forum rather than individual consent applications.
- 37 The Applicant can confirm that the conditions proposed relating to image dwell time and fading between images for the Billboard will ensure that the images will not flicker, which is a common misconception with billboards.
- 38 Another submitter, Ms Wells also raised genuine concerns regarding the impact of advertising on children. She considered that the proximity of the Margaret Mahy playground rendered the Billboard inappropriate and consent should not be granted.
- 39 It is submitted that advertising per se is not a relevant consideration when determining whether or not to grant consent to the Billboard. The area surrounding the Margaret Mahy playground displays a number of permitted signs displaying advertisements, particularly around the existing café. It is submitted that it is a stretch that children will be looking back at the Billboard whilst crossing the road towards the playground. Mr Compton-Moen's evidence has demonstrated that when within the playground the Billboard will not be highly visible as it is largely screened by either building, vegetation or a combination of the two.²⁰

¹⁷ Ms McAra referred to natural movement vs LED lighting from the Billboard and said this was different to visual processing and thought it was equivalent to the internet, and that we needed to make the environment more restful for the community.

¹⁸ Dukic, Tania & Ahlstrom, Christer & Patten, Christopher & Kettwich, Carmen & Kircher, Katja. (2013). Effects of Electronic Billboards on Driver Distraction. Traffic injury prevention. 14. 469-476

¹⁹ Statement of Evidence of Mr Andrew Carr at [79] to [83]

²⁰ Statement of Evidence of Mr David Compton-Moen at [38]

Amendments to the Billboard and other matters

- 40 At the hearing, the Council experts suggested amendments could be made to the Billboard that would, in their opinion, make it more acceptable.
- 41 The Applicant has considered these suggestions, together with the industry size standards for Billboards. The Applicant agrees and offers to:
- (a) reduce the height of the Billboard to 8m from ground level; and
 - (b) replace the single pole with a solid base, as a more comparable situation to the permitted baseline presented during the hearing. Please see updated Graphic Attachment View VP5C **attached**.
- 42 Ms Brown and Mr Nicholson for the Council both justified the reason for the short term consent to the Commissioner as they thought enabling the Billboard will disincentivise Wilsons Parking from developing the site. This is not effects based, and not a valid RMA consideration. It would be concerning if this is the reason for the underlying opposition from Council to the Billboard. The Applicant has confirmed its future intention is to develop the site with a commercial building. The establishment of the Billboard will not prevent future development of the site.

Conditions

- 43 The imposition of conditions on a development should be linked to mitigation of an actual or potential adverse effect that is based in evidence.
- 44 The Applicant has considered the comments from the Council and incorporated Ms Brown's conditions, where appropriate, into the Applicant's proposed conditions. An updated set of conditions is **attached** to this reply.
- 45 The conditions recommended by Ms Brown that have not been included are:
- (a) Condition 2 – a 5 year limitation period;
 - (b) Conditions 3 and 4 – the removal of the Billboard consequent to development of 192 Gloucester Street is inappropriate. The effects on 192 Gloucester Street are considered acceptable and neither the land owner nor developer submitted on the application. It is submitted that Ms Brown has not given this any weight;
 - (c) Condition 6 – a 2 minute dwell time between 11pm and 7am;
 - (d) Condition 8 is very similar to the Applicant's proposed condition 3. The Applicant's proposed condition 3 is preferred due to the wording in 3d and 3f which adds clarity and avoids confusion;

- (e) Condition 14 seeks to impose luminance values associated with a sensitive environment. The Billboard is not proposed to be located in a sensitive environment, which Ms Brown has accepted.²¹ Further the Council's own practice note provides that :

*"existing residential owners/occupiers on non-residentially zoned land are less likely to be affected due to the nature of the surrounding environment and generally lower level of visual amenity, and if similar signage could be erected on/near the site as a permitted activity. Assessment is required on a case by case basis."*²²

Future residents arguably would have a lesser degree of sensitivity as they will choose to occupy those dwellings in the knowledge of the central city business environment and the Billboard's existence. Therefore, it is submitted that this condition is inappropriate and the Applicant's proposed condition 10 should be preferred.

Conclusion

- 46 Having regard to the context of the site and its surrounds, the Applicant's case is that when viewed with a realistic lens and in the context of what the District Plan seeks to provide for, the Billboard is not expected to generate unacceptable effects, and overall is consistent with the relevant District Plan objectives and policies.
- 47 The Applicant is confident that matters raised by Council and submitters have been appropriately considered and responded to in legal submissions and through the technical evidence.

²¹ Summary of s42A Officer Report of Ms Georgia Brown, 28 February 2022 at [12]

²² CCC Billboard Practice Note (03/2021) at page 9

48 It is submitted that the revised Billboard is deserving of consent under the RMA.

Dated this 18th day of March 2022

A handwritten signature in black ink that reads "A Booker". The signature is written in a cursive style with a large, stylized initial 'A'.

Alex Booker

Counsel for the Applicant

Attachment A: Proposed Conditions of Consent

1. The development shall proceed in accordance with the information and plans submitted with the application. The Approved Consent Document is entered into Council Records as RMA/2020/1877 (xx pages)
2. The billboard shall have a maximum dimension of 6m by 3m, and maximum height above ground level is 9m.
3. Only still images shall be displayed on the billboard, with a minimum duration of 10 seconds per image.
4. The transition between images shall occur by way of a 0.5 second cross-dissolve.
5. The screen shall not display any of the following:
 - a. Live broadcast or pre-recorded video;
 - b. Movement or animation of images;
 - c. Flashing lights or images;
 - d. Sequencing of consecutive advertisements (ie where the meaning of an image is dependent upon, or encourages viewing of, the image that immediately follows);
 - e. A split screen (i.e. more than one advertisement at any one time);
 - f. Graphics, colours (red, green, orange, white or yellow), text or shapes in isolation or in combinations such that they can be reasonably considered to resemble, cause confusion with, or distract from a traffic control device; or
 - g. Content that invites or directs a driver to take any kind of driving action.
6. The screen shall not contain any retro-reflective material to prevent sunlight or reflection which may dazzle drivers.
7. The billboard must use LED technology.
8. There shall be no sound associated with the sign and no sound equipment is to be installed as part of the screen.
9. In the event of digital screen failure, the billboard screen shall either default to black or switch off.
10. The billboard shall result in no more than 10.0 lux spill (horizontal or vertical) of light when measured or calculated 2 metres within the boundary of any adjacent site, and Manchester Street.
11. The digital screen shall incorporate lighting control to automatically adjust brightness in line with ambient light levels.
12. The billboard shall not exceed the following luminance values:
 - a. Daytime: 5000 cd /m²; and
 - b. Night-time: 175 cd/m² maximum.
13. Within 30 working days of the display becoming operational, the consent holder shall submit a certification report from an appropriately qualified lighting designer/engineer confirming compliance with conditions 9-11. The report shall include at least three luminance readings of the billboard, including:
 - a. One recording at midday;
 - b. One recording during the hours of darkness; and

- c. One recording up to 30 minutes after sunrise or 30 minutes prior to sunset. The report shall be submitted to the Council via email to rcmon@ccc.govt.nz, Attention: Team Leader Compliance and Investigations.
14. The condition and appearance of the billboard shall be maintained at all times.
15. Prior to the erection of the billboard, a written maintenance programme, in the form set out in Appendix 6.11.16, shall be prepared by the operator/provider and submitted to the Christchurch City Council via email to rcmon@ccc.govt.nz, Attention: Team Leader Compliance and Investigations.
16. Pursuant to Section 128 of the Resource Management Act 1991, the Council may serve notice on the consent holder of its intention to review, in whole or in part, conditions 1 to 13, in order to deal with any adverse effect on the environment which may arise from the exercise of this consent and which it is appropriate to deal with at a later time.

Advice notes

The consent holder's attention is drawn to the following:

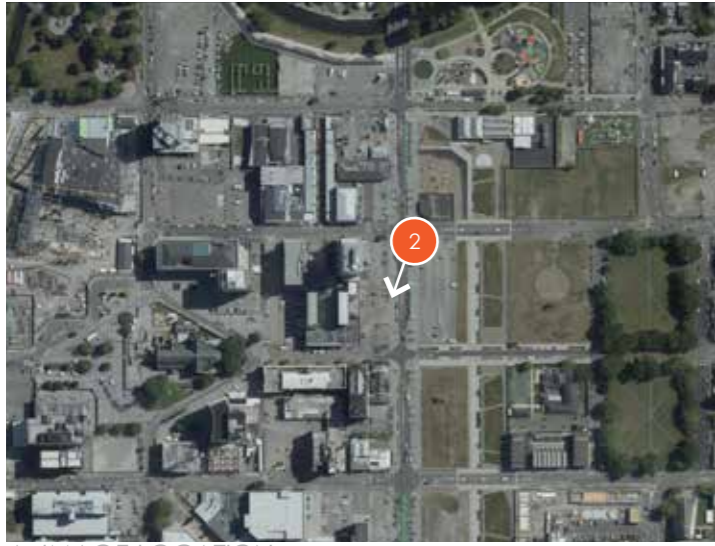
- a. The guidelines for advertising contained in the NZTA Traffic Control Devices Manual, Part 3, Advertising Signs.
- b. The Advertising Standards Authority Advertising Code of Practice and the Broadcasting Act 1989.

A cross-dissolve (condition 2) is a transition between images where one image fades out while at the same time another image fades in. The purpose of condition 3f is not to prohibit the use of a particular graphics, colour, text or shapes but to manage the use of these in order to avoid confusion with traffic control devices.



SIGN ELEVATIONS

Scale 1:50 @ A3



A. IMAGE LOCATION



B. EXISTING VIEW



C. PROPOSAL SIGN - 9m



D. PROPOSAL SIGN - 8m, solid base