
TO: Plan Change 1 Team, City Development

FROM: Mark Mawdsley, Team Leader Advisory Services, City Development

DATE: 18 October 2024

SUBJECT: **HERITAGE & URBAN DESIGN COMMENTS ON 2GP PLAN CHANGE 1 - MINOR IMPROVEMENTS**

Introduction

1. This memorandum contains my comments on change proposals included in Plan Change 1 – Minor Improvements that have potential urban design and/or heritage implications. The comments provided respond to the requests sent to me by staff working on the Plan Change 1 project for adding specified new scheduled heritage buildings (Change SHB3), and for election signs (Change CP19).

Change SHB3 – Add specified new scheduled heritage buildings

2. The purpose of Change SHB3 is to assess the limited number of buildings listed in the Section 32 Report for their suitability for scheduling as scheduled heritage buildings in accordance with Policy 2.4.2.1.
3. I have been asked to provide a summary of the process used to identify and assess the buildings that are included within the scope of Plan Change 1.
4. 146 buildings have been assessed for heritage significance and meet the criteria for scheduling in the 2GP. The places that are proposed for scheduling demonstrate heritage significance in accordance with one or more of the significance criteria outlined in Policy 2.4.2.1.b.
5. Where a place can demonstrate heritage significance under one or more of the criteria, its level of significance is compared to existing scheduled heritage buildings or structures to ascertain if the level of significance meets the threshold established by the existing 2GP heritage schedule. Some of the places proposed for scheduling do not easily compare with places on the existing schedule and this is noted in the assessment for that place.
6. The places that have been assessed were identified through one, or in some instances a combination of, the following methods;
 - a) Have been listed as a historic place by Heritage New Zealand Pouhere Taonga (HNZPT) in accordance with the criteria in Section 66(3) of the Heritage New Zealand Pouhere Taonga Act 2014 since the last plan variation;
 - b) Places identified as a character contributing building within a heritage precinct that demonstrate heritage significance in addition to their contribution to the heritage precinct;

- c) Demonstrate underrepresented themes as identified in the Dunedin Contextual Thematic History;
 - d) Were provided financial assistance by the Dunedin Heritage Fund and the grant was conditional on DCC completing a heritage assessment to determine if the place warranted inclusion on the 2GP heritage schedule;
 - e) Are located on large land parcels and subject to the intensification provisions introduced as part of Variation 2 (e.g. in General Residential 2 Zone) and subject to new/increased development pressure;
 - f) Are located in areas suggested as a heritage precinct through the public submission process at the time the 2GP district plan was notified in 2015 and the precinct was rejected by the hearing panel;
 - g) Suggested by heritage advocates, members of the public, or building owners since the 2015 submissions period closed on the notified version of the 2GP; and/or
 - h) Identified by DCC Heritage Advisor or Team Leader Advisory Services as having a high level of risk and/or importance to Dunedin.
1. If there was no existing research or heritage assessment, the research and assessment was completed by either the DCC Heritage Advisor or an external consultant with experience in assessing places for heritage significance. I have peer reviewed all of the assessments that propose the place for scheduling.
 2. Where existing places have previously been assessed for heritage significance (usually against the criteria of the HNZPT Act), we have reproduced the research and considered how the assessment translates to the 2GP significance criteria of Policy 2.4.2.1.b.
 3. The extent of the research and assessment for individual places focused on determining if a place demonstrated heritage significance to a level that supported its proposed inclusion on the 2GP heritage schedule. If required, the research and assessment can be developed in more detail to support the proposed scheduling. In response to concerns from building owners, we have completed more detailed research and assessment for a small number of places.
 4. The approach that Dunedin City Council has developed over numerous plan changes is to identify 'protected parts of a building'. For consistency with existing buildings on the heritage schedule, individual assessments identify what parts of a building have been proposed for heritage protection. A key consideration for identifying the protected part is the visibility of that aspect of the building from the public domain; to achieve an appropriate balance between the 'public good' of heritage protection with any constraints that are placed on the building.
 5. The 2GP generally protects the exterior of heritage buildings and only a small number of interior spaces are identified in the existing heritage schedule. Some interior spaces of buildings have been proposed for protection where they have notable qualities, are publicly accessible, or have been nominated by the building owner.
 6. The heritage assessment focuses on determining if a place demonstrates heritage significance. The physical condition of the place does not necessarily negate heritage significance unless the extent of repair is so great that it will require that a place is substantially altered/rebuilt. It is typical for a historic building to require repairs and upgrading; however, extensive rebuilding that results in the substantial loss of historic building fabric may diminish the potential heritage significance of the place.

7. It is acknowledged that there are other places across the city that have potential heritage significance and the work to identify and assess these places is ongoing. Comparison between places that have been assessed with those that have not been assessed or scheduled should not be construed to mean that a place proposed for scheduling does not warrant inclusion on the heritage schedule.

Election signs (Change CP19)

7. The purpose of Change CP19 is to review the Plan provisions for election signs to ensure they adequately enable local and central government candidates to advertise their candidacy while minimising, as far as practicable, any adverse effects.
8. The scope of this change extends to a review of Rule 4.5.7.1 Number, Location and Design of Temporary Signs – General (in relation to election signs only) and a review of Rule 4.5.7.2 Number, Location and Design of Temporary Signs – Election signs.
9. I have been asked to provide comments on whether changes to make the temporary signs performance standard more lenient for election signs would be acceptable in terms of the effects on streetscape character and heritage values.
10. In considering the potential effects of these changes, I have been asked to take into account the temporary nature of election signs, which are limited to a display time of 2 months (Rule 4.5.7.2) and are only associated with local body and general elections, which each occur on a 3-year cycle. This means that election signs will only appear for a total of 4 months over a 3-year cycle (an average of 1.3 months per year).
11. Election signs are displayed for a defined timeframe, and unlike real estate signs are displayed concurrently during an election period. Changes to the temporary sign provisions for signs other than election signs have not been considered in this comment.
12. The existing 2GP election sign rules (Rule 4.5.7.2) allow each candidate/party to display only one sign at any one site (this is not the maximum number of signs at any one site, rather the limit that one candidate/party may display at a single site). It also determines the maximum size and height of the sign. This rule allows election signs to a maximum size of 3m² per display face and a maximum height of 4m in commercial and mixed use (CMU) zones within pedestrian street frontages and heritage precincts. The 2GP provides higher height limits for signs in CMU zones outside pedestrian street frontages and heritage precincts.

Election signs along Pedestrian Street Frontages

13. This advice applies to election signs attached to buildings and freestanding within pedestrian street frontages located in the CBD, centres, and warehouse precinct zones. There are two types of pedestrian street frontages; primary, where a high level of pedestrian amenity is expected (refer Policy 18.2.3.2) and secondary, where a good level of pedestrian amenity is expected (refer Policy 18.2.3.3).
14. The visual effects on key pedestrian areas will be temporary and limited only to the period when election signs can be displayed.

15. During election campaigns, individual candidates have signs and groupings of election signs can comprise numerous individual signs. From an amenity perspective, election signage of multiple candidates on pedestrian street frontages is likely to generate visual clutter that detracts from the amenity of the streetscape.
16. The existing 2GP provisions allow only one sign per site per candidate/group of candidates and political party. Each candidate is only permitted to display one sign, however, the maximum number of signs will be limited by the number of candidates/political parties running for election. This permits clusters of election signs to be installed on a site, popular locations for past elections include arterial routes such as the Caversham bypass.
17. The number of candidates in future elections cannot be predicted. Therefore, there is no way to anticipate/manage the maximum number of signs that can be installed at a site on a pedestrian street frontage. The extent of signage typically installed at locations like the Caversham bypass is not appropriate for buildings within the CBD. A limit on the number of signs that can be installed at one site is necessary to manage the effect of excessive signage on the amenity of pedestrian street frontages.
18. The width of the street façade (in addition to the political persuasion of the building's owner) will naturally limit the number of signs that will be installed on buildings. However, it is preferable that election signage is a) limited to manage the overall effect on the streetscape, and, b) distributed along the streetscape rather than clustered on a single building. For buildings located on a pedestrian street frontage, it is preferable to limit election signage to avoid clusters.
19. Allowing only one sign per site is the simplest method to manage the overall number of signs in a streetscape and also the visual effect of clustered signs. Another method may be to allow only one sign per a specified length of street façade for facades that are longer than a typical building in a particular location, e.g. Meridian Mall. It will likely be easier to manage enquiries/compliance with a 'one sign per site' performance standard, requiring resource consent for site specific opportunities like the Meridian Mall.
20. The existing 2GP provisions restrict election signs to a maximum 4m height and has the effect of limiting signage to generally below street verandahs. The upper levels of building facades, particularly historic buildings, contribute positively to the amenity of the streetscape. If this height restriction is to be removed signage may be fixed to upper-level facades and parapets along the pedestrian street frontages.
21. Signage that conceals the decorative elements and fenestration of the upper-level facades will reduce the visual amenity of the streetscape.
22. An appropriate balance may be to allow election signage on the top of a verandah. Signs in this location will generally be above 4m, however, will remain relatively low on the overall façade and obscure only the lower portion of the second storey. This will allow parapet detailing, decorative elements, and fenestration of the upper-level facades to remain visible in the streetscape.
23. Restricting signs to only the top of verandahs will mean that election signs are in a consistent location in the overall streetscape. This will balance a less restrictive approach for election signage with the potential effects on the visual amenity of streetscape.

Election signs within Heritage Precincts

24. The 2GP manages scheduled heritage buildings, structures and sites, and heritage precincts, through the heritage provisions of the plan.
25. The heritage precincts contain both scheduled heritage buildings (SHB) and character contributing buildings (CCB), the heritage streetscape character of the precincts is managed and focuses primarily on the aesthetic qualities of the streetscape.
26. Again, the visual effect on heritage streetscape character will be temporary and limited only to the period when election signs can be displayed.
27. SHB are protected for their individual heritage values and do not need to be located within a heritage precinct. When SHB are located in a precinct, the focus is primarily on protecting the heritage values and physical fabric of the building.
28. The effect of election signage in heritage precincts will be primarily on the heritage streetscape character of the heritage precinct. The effect on the physical fabric may have a potential effect on the heritage values of SHB.
29. Similar to the pedestrian street frontages, the temporary effects of election signage on heritage streetscape character can be mitigated to an acceptable level by:
 - a. Limiting signs to only one per site (or an alternative method based on distance).
 - b. Only allowing signs on the lower portion of the second storey so that they do not obscure parapet detailing, decorative elements, and fenestration of the upper-level facades.
 - c. Specifying a location for signs so that they do not detract from cohesive patterns in the streetscape.
30. For SHB, signs should be installed in a manner that does not result in permanent damage to the physical fabric. Mechanical fixing to face brick or plaster finishes is not appropriate for a temporary sign. The likelihood of temporary signs causing unnecessary damage to historic building fabric is high and this should be discouraged. Installing signs to the top of verandahs can be accepted as this aspect of the building can be easily repaired or have permanent mounting brackets installed where they are not visible to pedestrians on the street.

Illuminated Election Signs

31. The existing 2GP provisions restrict illuminated signs in heritage precincts. The existing provisions are important in two distinct aspects; a) historic signage, with the exception of neon, was generally not illuminated, and b) the visibility of the historic architecture is prioritised over signage.
32. To balance the effect of election signage on heritage streetscape character, illumination should be restricted to non SHB/CCB buildings. This will reduce the potential number of illuminated signs in heritage precincts and avoid visual conflict where an illuminated sign is located in front of the upper-level façade of a SHB/CCB that is not illuminated.

33. Illuminated signs will require light fittings and also likely require surface mounted conduits for wiring. Not allowing illuminated signs on SHB will reduce the use of mechanical fixings to secure light fittings and conduits. This will minimise unnecessary damage to the historic building fabric from installing illumination for temporary signs.

Signs located inside of buildings windows

34. Election signs installed behind the glazing of ground floor or upper level windows will have a minimal effect on either the amenity of pedestrian street frontages or heritage streetscape character of heritage precincts. Signs within windows can be permitted.

Signs over existing signs

35. Election signs installed over existing (legally established) signage will not have any additional effect on either the amenity of pedestrian street frontages or heritage streetscape character of heritage precincts. Signs installed over legally established signage in windows can be permitted unless the building is a SHB and new mechanical fixing will be required.

Summary

36. Changes to the temporary sign provisions, to provide flexibility for election signage, can be supported provided that:
- a. The number of signs installed at any one site is limited to ensure that signs are not clustered on a single building. This can be adequately managed by limiting election signs to one per site (or an alternative method based on distance).
 - b. If signs are located above 4m, that they are restricted to the lower portion of the building and do not obscure parapet detailing, decorative elements, and fenestration of the upper-level facades.
 - c. Illuminated signs are not installed on SHB or CCB.
 - d. Signs requiring mechanical fixing are not installed on SHB. However, installing signs to the top of verandahs can be accepted as this aspect of the building can be easily repaired or have permanent mounting brackets installed where they are not visible to pedestrians on the street.
37. Allowing election signs above verandahs will likely signal that it is 'acceptable' for temporary signs to be installed in this location. This may lead to other temporary signs, e.g. real estate signs, being installed above verandahs both during and outside of election periods. The drafting of the rule should be explicit that only election signs, during the election campaign period, are exempt from the typical temporary sign provisions.

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