

PLAN CHANGE 1 – MINOR IMPROVEMENTS - NON-HERITAGE TOPICS

SECTION 42A REPORT

25 July 2025

APPENDIX C.3 HERITAGE AND URBAN DESIGN EVIDENCE

BEFORE THE PLAN CHANGE 1 HEARING PANEL

IN THE MATTER

of the Resource Management
Act 1991

AND

Plan Change 1 to the Second
Generation Dunedin City District
Plan (2GP)

STATEMENT OF EVIDENCE OF MARK ROSS MAWDSLEY FOR DUNEDIN CITY COUNCIL
Dated 29 May 2025

QUALIFICATIONS AND EXPERIENCE

1. My name is Mark Ross Mawdsley.
2. I am employed by the Dunedin City Council ("the Council") as the Team Leader Advisory Services with the City Development team. In my current role I am responsible for leading a team comprising heritage, urban design, and biodiversity professionals.
3. I hold a bachelor's in architecture (First Class Hons) and a Master in Heritage Conservation. I am a registered architect under the NZ Registered Architects Board, an Architect Member of the NZ Institute of Architects, and a member of ICOMOS (International Council on Monuments and Sites) Aotearoa New Zealand. My professional experience has included practising as an architect and heritage consultant in the private sector, both in New Zealand and Australia, and in the public sector as a heritage advisor to local government.
4. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE AND OVERVIEW

5. My evidence relates to submissions where the DCC Policy Planning team require further advice about.

DATED this 29 day of May 2025



Mark Ross Mawdsley
Team Leader Advisory Services
City Development
Dunedin City Council

RESPONSE TO SUBMISSIONS

CHANGE CP19: ELECTION SIGNS – HERITAGE

- Submitter Heritage New Zealand Pouhere Taonga (S272.001) seeks to amend the change so that illumination of election signs is not permitted in heritage precincts, as they consider the visual effects of illuminated signage within precincts to have more than minor effects. HNZ do not agree that the proposed rule will be sufficient to offset any adverse effects of illuminated election signs in heritage precincts.

CHANGE CP19: ELECTION SIGNS - URBAN DESIGN

- Submitter Jasmin Taylor (S136.001) seeks to amend the change so that it does not allow election signs to be illuminated, as this is unnecessary and adds to light pollution.

Effect on Heritage Precincts (S272)

1. Heritage New Zealand Pouhere Taonga (S272) states in their submission that they do not support the proposal to allow illuminated election signage within the heritage precincts.
2. I agree with the view of HNZPT that illuminated signage has the potential to have an undesirable effect on the visual amenity of the heritage precincts. Illuminated signage also has the potential for undesirable effect on the heritage values of scheduled buildings within the precinct.
3. I support the existing 2GP provisions that restrict illumination of permanent signage within the heritage precincts, to protect the amenity and heritage values.
4. However, the temporary nature of election signs is the critical aspect of this matter. Election signage is permitted for a two separate periods, each lasting two months, within a three-year timeframe.
5. I am comfortable with the proposal to provide for illuminated election signage in the heritage precincts on a temporary basis, provided that the 2GP manages the location and limits the number of signs that can be illuminated. Principally, seeking to concentrate the signage on buildings that have lesser heritage and amenity values to mitigate the potential effects.
6. My initial advice to the policy planners was that illuminated election signage should be limited to buildings that are not scheduled heritage buildings (SHB) or character contributing buildings (CCB). SHB have been identified for their significant heritage values and CCB have been identified for their amenity values and are generally historic buildings. Where permitted, illuminated elections signs will be located on buildings with lesser heritage/amenity values.
7. In my initial advice, I am supportive of allowing election signs within windows of SHB/CCB but recommended that they are not illuminated. This aspect of my advice was not adopted, my view remains that election signs within windows of SHB/CCB should not be illuminated.
8. Another aspect of my initial advice to the policy planners was that election signs should be limited to one per site (or an alternative method based on distance), as opposed to one per candidate or group of candidates, one per political party for each site. This aspect of my advice was not adopted. The proposed provisions will not manage the potential number of illuminated election signs.

9. My view remains that the 2GP provisions should prevent clusters of elections signs on buildings, regardless of if the election signage is illuminated or not. However, limiting the number of non-illuminated election signs to only one per site/building is not within the scope of submissions.
10. For a non SHB/CCB in a heritage precinct multiple illuminated election signs may be erected (one per each candidate or group of candidates, and one per political party). An example is the building at 477 Moray Place, on the corner of Princes Street and Moray Place.
11. Rule 4.5.7.2 establishes the number of signs for individual sites. I recommend that the rule is clarified so that the potential number of signs can be quantified to fully understand the potential effects:
 - a) Where there is more than one building per site, I recommend limiting the maximum number of signs to one per site.
 - b) Where there is more than one site within a single building (e.g. a unit title apartment building), I recommend limiting the maximum number of signs to one per building.
12. Commercial heritage precincts contain a high proportion of SHB and CCB. Limiting illuminated election signage to the remainder of the buildings (non SHB/CCB) within the heritage precinct will limit the number of sites/buildings on which illuminated signs can be erected. Note the locations below are primary streetscapes/vistas and may comprise multiple adjoining commercial heritage precincts.
 - a) For Stuart Street between the Octagon and the Railway Station, 2 of the 22 sites/buildings are non SHB/CCB.
 - b) For George Street between the Octagon and the Fredrick/Pitt Street intersection 12 of the 87 sites/buildings are non SHB/CCB.
 - c) For Princes Street between the Octagon and the Manse/Jetty Street intersection 7 of the 46 sites/buildings are non SHB/CCB.
13. Additionally, Section 267A of the Electoral Act 1993 states the general election signage must not be illuminated where visible from a road. Importantly, this will further limit the number of signs that can be illuminated when considered over a three-year period i.e. a sign on a non SHB/CCB in a heritage precinct may not be able to illuminated for general election signage, only local election signage.
14. I recommend limiting the number of illuminated election signs to only one per site/building to prevent clusters of illuminated election signs on any single site/building. With such a limit, the maximum number of illuminated elections signs that can be installed in important streetscapes/individual precincts can be estimated and allow the extent of the potential effect to be understood.
15. Assuming the above, illuminated election signage in the areas of Stuart, George, and Princes Street identified in para 11 above will be limited to a total of 21 signs (2, 12, and 7 respectively). Under the provisions of Section 267A of the Electoral Act 1993, it is assumed that only local election signage can be illuminated. This means that these signs will be illuminated for only two months in each three-year period.
16. It is my recommendation that illuminated election signs (it is not within scope to limit non-illuminated election signs) are limited to one per site/building (as per para.10 above) to avoid clusters of election signs on non-SHB/CCB buildings on heritage precincts. The resulting provisions will follow this hierarchy:
 - a) SHB buildings – Non illuminated election signs can be installed in select locations with a focus on a fixing method that will prevent damage to historic fabric.

- b) CCB buildings – Non illuminated election signs can be installed in select locations.
- c) Non SHB/CCB buildings – Illuminated signs can be installed in select locations. This is the minority of buildings with a heritage precinct.

Potential for Light Pollution (S136)

17. Jasmin Taylor (S136) states in their submission that the illuminated of election signs is unnecessary and the illumination will add to light pollution.
18. A submitter raises concern about illuminated election signs creating additional light pollution. I am commenting only on the effects of illuminated election signage on the built environment i.e. urban design considerations. It is not within my expertise to comment on the potential effects of additional illumination on the quality of the 'dark sky' environment.
19. The proposed change is limited to the pedestrian street frontage mapped area (PSFMA) or heritage precincts in the Commercial Mixed Use (CMU) Zone only excepting the Harbour Edge and Warehouse Precinct zones. It is not proposed to allow illuminated election signage in the other 2GP zones; illuminated election signage will not be permitted in residential or rural contexts.
20. The PSFMA and heritage precincts are located in the central city area there is a high degree of overlap between the two overlays. However, the PSFMA extend beyond the extent of the heritage precincts i.e. parts of Filleul and Great King Streets.
21. The locations where illuminated election signage is proposed already demonstrate a high degree of artificial light from street lighting, business signage, internal light in buildings, feature lighting and traffic lights. Illuminated election signage will create additional artificial light to this environment. This will be more noticeable along streets subject to a PSFMA but that are outside of a heritage precinct.
22. Again, effects will be limited by restricting the number of signs as discussed above. I recommend that illuminated election signage is restricted to one per building/site so that the effect of light pollution will be both quantifiable and reduced.
23. Under the provisions of Section 267A of the Electoral Act 1993, it is assumed that only local election signage can be illuminated. Therefore, illuminated election signs in these environments will be for a period of only two months in each three-year period.
24. Nevertheless, a range of measures can be implemented to further reduce the effect of light pollution. This may include:
 - a) Limiting lux levels to avoid the use of powerful floodlighting etc
 - b) Lighting is static i.e. not dynamic or flashing
 - c) Colour tone of the lighting
 - d) Downward facing wash lighting on the face of the sign (rather than internal illumination) can minimise glow and light spill on the surrounding environment.
25. The effect of illuminated election signage will be temporary. When present, the effects on the urban environment can be further mitigated by limiting the type, direction, and the nature of any artificial lighting. A performance standard that requires election signs to be illuminated with a static downward facing wash lighting is recommended as these qualities can easily be checked for compliance.
26. In conclusion, having reviewed the information provided by Heritage New Zealand Pouhere Taonga, it is my view that the overall effect on the heritage precincts can be managed by

restricting the potential number of individual illuminated elections signs. I recommend that the rule is revised to allow only one illuminated election sign one per site/building on the basis that:

- a) Where there is more than one building per site, illuminated election signs are limited to one per site.
- b) Where there is more than one site within a single building (e.g. a unit title apartment building), illuminated election signs are limited to one per building.

27. Having reviewed the information provided by Jasmin Taylor, it is my view that light pollution can be reduced by managing the light source. I recommend a performance standard that requires election signs to be illuminated with a static downward facing wash lighting.

28. In addition to existing restrictions that allow illuminated election signage only during election periods, my recommendations above will, in my view, mitigate the potential effect of illuminated election signage on the values of the heritage precincts and amenity of the urban environment to an acceptable level.