

BEFORE THE INVERCARGILL CITY COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND **An application to the Invercargill City Council** by 104 Dee Street Partnership for resource consent to demolish a Heritage New Zealand Pouhere Taonga Category 2 heritage building located at 104 Dee Street, Invercargill (RMA/2025/115).

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF CHRISTINE MCMILLAN
ON BEHALF OF 104 DEE STREET PARTNERSHIP**

PLANNING

15th October 2026

SUPPLEMENTARY STATEMENT OF CHRISTINE MCMILLAN ON BEHALF OF 104 DEE STREET PARTNERSHIP

Summary of Evidence

Introduction and Scope

1. My name is Christine Elizabeth McMillan. I am a Planner employed by Bonisch Consultants, a consultancy firm specialising in land development.
2. I prepared evidence dated 31st August 2025. My evidence considered that the proposed demolition of the fire-damaged Briscoes Building will result in significant and irreversible heritage effects. However, extensive investigation of retention alternatives, together with evidence regarding structural safety, technical feasibility and cost, supports demolition as an appropriate response in the circumstances. Subject to conditions requiring heritage recording, vacant site management and future redevelopment measures, the proposal is not contrary to the objectives and policies of the Invercargill City District Plan when considered holistically. While the demolition will result in adverse effects on heritage the demolition and redevelopment of the site undertaken in consideration of surrounding heritage values will further the aim of the Business 1 Zone to *'maintain and reinforce the viability and vibrancy of Invercargill's City Centre by enabling a wide range of activities, by encouraging and maintaining a high level of amenity and by encouraging good urban design'*. When taken as a whole the demolition and proposed conditions of consent to manage redevelopment represents an appropriate outcome under the Resource Management Act.
3. This supplementary statement addresses points raised in the evidence provided by Mr Barsby and the s42A report addendum provided by Ms Skuse including discussion of conditions of consent. Except where expressly clarified or updated in this statement, the opinions and conclusions set out in my primary evidence remain unchanged.

Mr Barsby's Evidence

4. Mr Barsby considers that the alternatives to demolition have not been fully explored, particularly the potential temporary propping and retention of the building façades. He also considers that the Invercargill Central City Heritage Guidelines (Heritage Guidelines) provide the appropriate basis for guiding future development on the site, rather than the design requirements contained in proposed covenant conditions 28A, 28B and 28D. In addition, Mr Barsby does not consider that the concept design should be treated as an approved or otherwise acceptable design for the site. I address these issues below:

Alternatives to Demolition

5. The matters raised by Mr Barsby regarding the alternatives considered, including the practicability of temporarily propping the façades, have been addressed in the summary evidence of Mr Lane and Mr Griffiths. I rely on that expert evidence and do not duplicate it here. My planning assessment is provided on the basis of the technical conclusions reached by the relevant experts concerning structural safety, feasibility and the available retention options and I consider that the requirements of Policy HH-P5 Active Management and Rule HH-R10(8) & (10 to12) have been addressed to the degree necessary.

Concept Plan

6. The Heritage Guidelines have been updated from the 2016 version considered in the application for demolition of the Briscoes Building. I acknowledge the concern of both Mr Barsby and Ms Irvine regarding the suitability of the design in relation to the updated guidelines. Based on the evidence of both heritage experts I now consider that the BI Architect concept plan should be removed from the proposed conditions as a suitable design for a new build.

Future Design Guidance

7. I note that Ms Skuse in the addendum to the s42A report agrees with Mr Barsby that the Heritage Guidelines are a more appropriate mechanism to control future building design on the site. I consider that replacement of the design considerations in the proposed covenant with a requirement to be in accordance with the Heritage Guidelines is a suitable mechanism to achieve the objectives and policies of the Invercargill City District Plan (ICDP) in relation to heritage outcomes.
8. Mr Barsby considers that reliance on the Heritage Guidelines alone would not guarantee a high-quality design outcome and that an appropriate design team should be involved in the future redevelopment of the site. Ms Skuse has recommended that proposed condition 28B be amended to require a heritage architect to confirm that the design satisfies the parameters in condition 28A, with the design then being considered by the Council's Heritage Adviser.
9. Although the revised condition does not expressly require the establishment of a formal design team, it provides for the design to be considered by more than one appropriately qualified heritage professional. In my opinion, this establishes a reasonable and proportionate design review process. When combined with the Heritage Guidelines and the other proposed heritage conditions, it should provide an appropriate framework for achieving a well-considered redevelopment response.

Conditions of Consent

10. I have reviewed the suggested amendments to conditions of consent as set out in the s42A report and agree with these amendments.

11. One further amendment to condition 27 is requested to require that the site is levelled upon completion of the demolition works. The intent of this is to make it clear that the site must not present a safety hazard while the site is vacant. The suggested amended wording of Condition 27 is as follows: *In the period following demolition of the Briscoes building up until a replacement building is built the site must be cleared, **levelled**, made safe, and landscaped to ensure the temporary use/occupation of the land contributes positively to the streetscape of the Dess Street Historic Area and central city area.*

Heritage NZ Pouhere Taonga (NZHPT)

12. I note Mr Barsby's confusion in relation to the NZHPT email which stated that although demolition may not be the preferred outcome that this may not be the last resort and that they recommendations of NZ Heritage Properties. To clarify this, NZHPT are referring to the recommendations in the Heritage Properties addendum to the HIA. The addendum recommended building recording, management plans to guide demolition, salvage and reuse of materials, future design considerations, public outreach and archaeological protection. I consider that HNZPT have now withdrawn their initial objection.

Conclusion

13. The complete demolition of the Briscoes Building will result in significant and irreversible effects on historic heritage. Those effects cannot be fully avoided or remedied through conditions. The relevant planning question is therefore whether demolition is nevertheless an appropriate outcome when the effects, the available alternatives, the expert evidence and the proposed mitigation measures are considered together.
14. The applicant has not proceeded directly to demolition without considering other options. To reach the present position, the applicant has attempted the sale of the building, investigated alternatives to complete demolition, including options involving retention and temporary propping of the façades, obtained expert evidence addressing the structural condition and the technical feasibility and cost of the available retention options.
15. Having considered the evidence filed since my primary statement and the amended conditions recommended in the section 42A addendum, I remain of the opinion that the proposal is not contrary to the relevant objectives and policies of the Invercargill City District Plan when considered holistically. While the effects on heritage resulting from the complete demolition will be more than minor, the investigations undertaken, the constraints identified by the technical experts and the package of proposed conditions support demolition as an appropriate resource management outcome in the particular circumstances.

16. I therefore consider that resource consent may be granted, subject to the amended conditions.



Christine Elizabeth McMillan