

BEFORE THE INVERCARGILL CITY COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER an application for land use consent to
demolish the Briscoes Building at 104-106
Dee Street Invercargill, a Category 2 Historic
Place on the New Zealand Heritage List /
Rārangi Kōrero.

BY **104 Dee Street Partnership**
Applicant

SUPPLEMENTARY STATEMENT OF EVIDENCE OF: SUSAN IRVINE

14 October 2026

Counsel acting for Applicant:

Clare Lenihan, Barrister

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Introduction

1. My name is Susan Irvine. I am Principal Historian, Principal Heritage Consultant, Heritage Team Leader, and Lead Archivist at New Zealand Heritage Properties Ltd. Prior to joining New Zealand Heritage Properties, I worked for more than 12 years at Heritage New Zealand Pouhere Taonga as a Heritage Advisor, undertaking historical research and heritage significance assessments. I hold a Master of Arts in History from the University of Otago and a Master of Information Studies from Victoria University of Wellington. I am also nearing completion of a Master of Heritage Conservation at the University of Auckland.
2. I prepared evidence dated 31st August 2025, based on two reports relating to the Briscoes Building. The first was a Heritage Impact Assessment undertaken at a time when the owner had not yet determined a preferred course of action following the fire. That assessment concluded that the building possesses high overall heritage significance and that repair and adaptive reuse would be the most appropriate heritage outcome. The assessment did not support demolition.
3. Following investigation by the owner of a range of potential options, I was commissioned to prepare a Heritage Impact Memorandum assessing the effects of demolition on the heritage values of the building. That assessment concluded that demolition would have a large to very large adverse effect on the heritage values of the building. The effects on the Dee Street Historic Area were assessed as moderate to large.
4. The memorandum noted that the owner had considered the costs associated with a number of potential courses of action and had attempted to sell the building. At that stage, however, the option of propping and weatherproofing the building had not been costed. Since then, that option has been assessed.
5. In his evidence dated 5 June 2026, Mr Andrew Barsby (Origin) questioned a number of my findings. I have responded to those matters in my written evidence before the Panel dated 31 August 2026.
6. In his review of the additional material dated 18 September, Mr Barsby states at paragraph 29 that: "the purpose and function of an HIA is not to be a passive review of a decision that will cause an impact on heritage values, it is meant to be an iterative tool where the heritage consultant actively investigates alternative options to find the balance between the applicant's needs and heritage conservation. I believe the scope of the HIA was unnecessarily narrow and didn't look into options beyond what the owner had already received".
7. I disagree with Mr Barsby's characterisation of the purpose of a Heritage Impact Assessment as an iterative exercise requiring the heritage consultant to independently develop and investigate alternative options beyond those advanced by the applicant. A HIA is generally understood to be an assessment of the effects of a specific proposed activity on heritage values. Guidance prepared under the UNESCO World Heritage Convention defines a HIA as: "an activity-specific or project-level assessment that is

focused on identifying and assessing the potential effect of a proposed activity or project on the heritage/conservation values of a natural and/or cultural heritage place."¹

8. Consistent with this definition, the HIA assessed the heritage effects of the proposal that was before it. In my opinion, the scope of the HIA was neither unusually narrow nor inconsistent with accepted heritage assessment practice.



Susan Irvine

¹ UNESCO World Heritage Convention, 2026. <https://whc.unesco.org/en/glossary/255>