

RESOURCE MANAGEMENT ACT 1991
FOURTH SCHEDULE
ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

1. Background

The Bluff Oyster and Food Festival Charitable Trust (**the Trust**) propose to expand and develop the site of the Bluff Oyster Festival held at 100-116 Gore Road, 12 and 14 Lee Street and 73 Barrow Street, Bluff. The Oyster Festival currently operates an open air venue at the south end of the site with large open faced shelters on the western boundary. The site can currently cater to a maximum capacity of 5000 people and with the festival selling out each year well before the festival date the Trust wants to expand the area available to the festival. They intend to do this by demolishing the buildings currently standing on the northern portion of 100-116 Gore. The expanded area will allow an additional 1000 guest to attend the festival. The Trust plans to erect a shelter, with terraced gardens and interpretive panels, illustrating and describing the sites past use from the early days of European settlement in the Bluff area.

1.1 The Bluff Oyster and Food Festival

The Bluff Oyster and Food Festival is an annual event that has been held in Bluff for over 20 years. The festival has been held in various locations over the years with a dedicated, permanent home for the festival being developed in 2015. The festival draws people from all over New Zealand and the world to sample Bluff oysters as well as a variety of other local seafoods along with oyster opening competitions and live music and entertainment.

2 Site Description

The site is located at 100, 106, 108, 112, 114 and 116 Gore Road, Bluff. The site contains buildings collectively known as the Club Hotel but which are actually four separate buildings. These are:

Site Address	Building Name	Construction/Alteration Dates
100 Gore Road	Colonial Bank of New Zealand	constructed 1887/1888
106 Gore Road	Huddart Parking Building	constructed 1891
108, 112, 114 Gore Road	Club Hotel	constructed 1884/1885, façade replac ed 1903, internal structure replaced 1914
116 Gore Road	Scott's Private Hotel –	constructed 1891, incorporated into Club Hotel 1903, façade replaced 1903

The adjoining neighbour to the west is the Bluff Lodge, providing accommodation ranging from backpacker dorms to private rooms and a guest house. To the east is the Bluff Invercargill City Council Service Centre and Library. The rear of the site through to Barrow Street is occupied by the existing grounds for the Bluff Oyster festival.

The buildings are two storey buildings with various one storey outbuildings located at the rear of the site. Some recent demolition activity at the rear of the site has seen the clearance of some outbuildings deemed dangerous under the Building Act.



Figure 1: Site boundaries

The surrounding area is generally made up of a mix of commercial, residential and industrial activities. To the north of the site, on the opposite side of Gore Road is the Bluff skatepark with areas of green space separating Gore Road from the railway lines, Bluff port and Bluff Harbour.

Residential activity is located to the south of the site, with commercial activity located along Gore Road to the east and west.

Bluff Hill rises above Bluff to the south and is the dominant landform in the area.

Gore Road is State highway along the site frontage. This is a two lane 50km/hr highway with parallel parking located on both sides of the road.

Site Heritage

The site that the Club Hotel stands on has been occupied since the 1860s when Bluff was a small and isolated settlement. Prior to the four buildings that now make up the Club Hotel, the site was occupied by the Railway Hotel and the Terminus which was also a hotel. The Club Hotel was constructed and opened in 1885 after the Terminus hotel burnt down. In 1887 the Colonial Bank was constructed on the eastern side of Section 3. In 1891 the Huddart Parker building was constructed between the Club Hotel and the Colonial Bank. The in 1892 Scott's Hotel was built which included shops on the western half of Section 2.

In March 1903 fire ripped through the block. The fire rendered many of the walls dangerous and unstable, this included the frontages of the Club Hotel and Scott's private hotel. Following the 1903 fire substantial reorganisation and refurbishment of the building took place with part of Section 2 and the Huddart Parker building incorporated into the Club Hotel.



Image of the buildings circa 1910 (taken from HIA, p51)

Then in 1914 fire once again caused significant damage to the building. The Club Hotel and Huddart Parker building were destroyed. The building was rebuilt again in 1914 and operated as a hotel in various guises up to the early 20th century. The hotel was extensively refurbished in 1938 and again in 1985.

3 Description of Activity

The redevelopment of the site will see the demolition of the four existing buildings on the site, collectively referred to as the Club Hotel. The Club Hotel is registered on by Heritage New Zealand Pouhere Taonga as a Category II heritage building and is automatically listed as such in Appendix II of the Invercargill City District Plan.

The Trust intends to demolish these buildings, salvaging building materials wherever possible. The demolished materials which are unable to be salvaged will be disposed of on site in order to provide a foundation for the extended festival grounds and the terraced gardens and interpretive heritage area along the Gore Road frontage.

The site generally slopes upwards to the south from Gore Street to Barrow Street and there is a significant height difference of approximately 1.4m between the footpath on Gore Street and existing festival site area at the rear of the buildings. The use of the clean fill materials from the building as a base foundation for the terraced gardens and extended festival site allows for the reuse of material that would otherwise be headed for landfill in a functional and cost-effective manner.

McCulloch Architects have prepared design plans showing the intended end result for the Gore Street frontage with the main plan view provided below (Figure 2). A full set of the illustrative plans is provided in Appendix C.



Figure 2: Illustrative Plans showing proposed Gore Street frontage.

The design incorporates a terrace garden rising up from Gore Street with interpretive panels along a 2.4m high wall at the rear of the gardens. These panels will tell the story of the Club Hotel and early Bluff history. The display is not intended to be static and will be updated intermittently with new photographs and stories.

The demolition process will require reducing the road width to one lane for three to four days to enable set up for the demolition process. Traffic will be diverted through the southbound lane and parking lane during this process. During the building demolition, both lanes and the footpath of Gore Street will be required to be closed for seven days with traffic to be diverted around Lee Street, Barrow Street and Palmer Street.

Once the front of the building is down Gore Street will be reopened with a reduced width, again utilising the southbound lane and parking lane for traffic movement. This phase will continue for 7 to 10 days with Gore Street to reopen fully on completion of works.

4. Consideration of Alternatives

The Trust has sought expressions of interest from parties who would be able to restore and operate the hotel buildings over the past year. This has included advertising on Trade Me website and the Southland Express, this advertising resulted in one party looking through the hotel, however no offers were forthcoming. New Zealand Historic Places Trust Pouhere Taonga then advertised the hotel in its e - newsletter, *Heritage This Month*, but again there was no interest in the property.

Unable to find an interested party to purchase the hotel, and unable as the Charitable Trust, to operate the hotel themselves, the Trust then considered the option of retaining the façade only. The Trust engaged GM Designs to review the ability of the façade to be retained while the rest of the building was demolished. GM Designs produced a letter of commentary that stated that due to the deterioration of the materials used in the construction of hotel, the retention of the façade would be uneconomic.

In further discussions between NZ Heritage Properties and the Trust the potential to retain the Colonial Bank and Huddart Parker Building was mooted. The identification of the Club Hotel as four separate buildings had been detailed as part of the Heritage Impact Assessment research and it was considered that the retention of these buildings would allow the expansion of the Festival site whilst also allowing for preservation of the built heritage.

5. Proposed Invercargill City District Plan Assessment

4.1 Business 2 Zone

The site sits within the Business 2 (Suburban Shopping and Business) Zone which “provide for the City’s suburban business, commercial, cultural and social activities serving suburban communities centred at Waikiwi, Windsor, Glengarry and South City, and also for the town centre at Bluff.” (ICC District Plan)

The District Plan states that these areas ‘are seen as the foci for businesses such as supermarkets and cafes which have a local clientele and which also draw mutual benefit from being near to each other.

The District Plan also sets out the following issues identified for the zone:

The significant resource management issues for the Business 1 (Central Business District) Zone:

1. *The role of the Zones as the City’s suburban business, commercial, cultural and social centres is under threat if further dispersal of commercial activity occurs.*
2. *The quality of the environment and the standard of design and amenity can encourage or limit the ongoing viability of the Zones.*
3. *Land use can have effects on neighbouring residential areas.*

4.2 Coastal Environment

The site also has a Coastal Environment Overlay and the 5m contour (urban, derived) is also shown over the site, denoting areas at risk from sea level rise resulting from climate change.

The District Plan identifies the following significant resource management issues for the coastal environment:

1. *The natural character of much of the coastal environment is at risk from inappropriate subdivision, use and development.*
2. *There is a need to identify locations where subdivision, use and development are appropriate.*
3. *Public access to and along the coast is fragmented and in some places non-existent and this needs to be improved.*
4. *A range of activities, including sea ports and infrastructure, can have a functional need of coastal space.*
5. *The District’s coastal water and ecosystems are degraded by discharges from land based activities.*

4.3 Activity Status

The following tables sets out the relevant District Plan rules as they relate to the proposed development:

Overall the proposal is assessed as a **non-complying activity**:

Rule	Assessment	Status
3.8 HERITAGE		
<i>3.8.1 Rule 3.8 applies to any building, structure, place or area identified in Appendix II – Heritage Record in this District Plan.</i>	The buildings located on the site are identified in	Rule 3.8 applies to the site.

	Appendix II Heritage Record as a Category II building on the Heritage NZ Pouhere Taonga register.	
3.8.2 <i>Repair and maintenance to preserve the integrity of historic buildings and structures is a permitted activity provided that such work is undertaken using the same type of material to that originally used, and must retain the original design, form and texture of the feature under repair.</i>	The identified building will not be retained.	Does not comply
3.8.3 <i>Any alteration and/or addition to any building listed in Appendix II.3 Sites of Local Significance that does not affect the façade of the building is a permitted activity.</i>	The façade will not be retained.	Does not comply
3.8.4 <i>In relation to buildings listed in Appendix II.3 Sites of Local Significance the following activities are restricted discretionary activities: (A) Any alteration or addition to the façade. (B) Any signage attached to the façade.</i>	The façade will not be retained	N/A
3.8.9 <i>The relocation or demolition of any building or structure listed in Appendix II.2 Sites Registered by Heritage New Zealand Pouhere Taonga is a non-complying activity.</i>	The building will be demolished.	Non Complying Activity
3.24 BUSINESS 2 (SUBURBAN SHOPPING AND BUSINESS) ZONE		
3.24.1 Permitted Activities: The following are permitted activities within the Business 1 Zone: (C) Communal Activity	The use of the site for communal activity is a permitted activity in the Business 2 Zone.	Complies
<i>Height of structures</i> 3.24.4 <i>All new buildings and structures, and additions to existing buildings and structures, are to be designed and constructed to comply with the following maximum height and recession planes: (A) Maximum height: 10 metres. (B) Recession plane: Infogram 4 applies in relation to any boundary with any Residential Zone.</i>	The maximum height of the new structures on the site will not exceed 10m.	Complies
<i>Side and rear yards</i> 3.24.7 <i>A side and/or rear yard at least four metres deep shall be provided for activities along boundaries adjoining a Residential Zone.</i>	The site does not adjoin a residential zone.	N/A
<i>Outdoor Storage</i> 3.24.10 <i>Any area utilised for outdoor storage adjoining a residential area is to be screened from that residential area by a close boarded fence, solid wall or hedge not less than 1.8 metres in height.</i>	The site does not adjoin a residential zone.	N/A
Chapter 13 Noise		
3.13.1 Noise Measurement and assessment: <i>Sound levels are to be measured in accordance with the provisions of NZS 6801 2008: Acoustics - Measurement of Environmental Sound and assessed in accordance with the provisions of NZS 6802:2008: Acoustics</i>		

Environmental Noise, except where expressly provided elsewhere in the Plan.			
3.13.4 Construction Noise is to comply with the following noise limits:		Noise limits will be exceeded.	
Days and Times	Noise Limit		
Monday to Saturday 0730 – 1800	70dB LAeq and 85 LMax		
All other times	45dB Leq and 75 dB LMax		
3.13.18 Activity Status and Matters of Consideration (A) Where an activity does not meet the relevant Zone noise standards set out in Rules 3.13.1 – 3.13.17 above, the activity is a discretionary activity.			Discretionary Activity
Chapter 3.16 SIGNAGE			
3.20 TRANSPORT			

6. Assessment of Actual and Potential Effects

Resource Management Act 1991

Section 104 Consideration of Applications

(1) When considering an application for a resource consent and any submissions received, the consent authority must, subject to Part 2, have regard to—

- (a) any actual and potential effects on the environment of allowing the activity; and
- (ab) any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity; and
- (b) any relevant provisions of—
 - (i) a national environmental standard:
 - (ii) other regulations:
 - (iii) a national policy statement:
 - (iv) a New Zealand coastal policy statement:
 - (v) a regional policy statement or proposed regional policy statement:
 - (vi) a plan or proposed plan; and
 - (c) any other matter the consent authority considers relevant and reasonably necessary to determine the application.

The following sections set out the assessment of environmental effects and also provide an assessment under the Southland Regional Policy Statement and the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health. There are no other National Environmental Standards, regulations or policy statements which are considered relevant to this application.

6.1 Urban Context

6.6 Heritage

6.6.1 Heritage Impact Assessment

The applicant engaged New Zealand Heritage Properties to undertake a Heritage Impact Assessment and a copy of this report is attached in Appendix A. The following table sets out the Archaeological, Architectural, Cultural and Technological Values associated with the Club Hotel in accordance with the criteria outlined in the Heritage New Zealand Pouhere Taonga Act 2014, the definition of historic heritage in the Resource Management Act 1991, and best practice standards from HNZPT (2007a).

Archaeological Values	
Archaeological Information Low to Moderate	<p><i>Does the place or area have the potential to contribute information about the human history of the region, or to current archaeological research questions, through investigation using archaeological methods?</i></p> <p><i>The Club Hotel block has the potential to provide information about the site and Bluff's past. Three previous hotels have occupied this site, each of which was destroyed by fire. Archaeological investigations here have the potential to reveal information about the development of Bluff during the nineteenth century and the life of inhabitants of the site. The site survey suggests that there is little surviving pre-1900 fabric for Scott's Private Hotel, the Club Hotel, or the Huddart Parker Building with the buildings having been damaged significantly in the 1903 and 1914 fires. As such, all interior linings, partition walls, floor structures, and roof are believed to be twentieth century. The site survey and documentary research suggest that most of the exterior brick walls (apart from the street façade) are pre-1900. As such, there is low potential for gaining further archaeological information from a buildings archaeology perspective.</i></p> <p><i>Sections 2 and 3 represent a foci of Bluff's early history, and there is potential for subsurface archaeological features associated with the earlier phases of occupation. Subsequent rebuilding and repair of fire-damaged buildings may have affected subsurface features associated with the earlier buildings and occupations on these properties; however, should features be preserved, they could provide considerable insight into early commercial activities in Bluff.</i></p>
Architectural Values	
Architecture Moderate	<p><i>Is the place significant because of its design, form, scale, materials, style, ornamentation, period, craftsmanship or other architectural element?</i></p> <p><i>Moderate</i></p> <p><i>Architectural value considers if a place or structure is significant because of its design, form, scale, materials ornamentation, period craftsmanship or other architectural element. NZHP considers the Club Hotel and associated buildings to possess architectural value. The façade of the Club Hotel was extended across Scott's Private Hotel in 1903 in a Renaissance Revival style, sharing similar elements with the nineteenth century facades of the Huddart Parker Building and Colonial Bank. The style and the scale of the buildings is relatively grand for a settlement the size of Bluff and reflects the architectural fashions of larger centres at the turn of the twentieth century. The interior of the Huddart Parker Building, Club Hotel, and Scott's Private Hotel was largely rebuilt following 1914. In the 1930s, the hotel was redecorated, and these finishes remain in the hotel foyer and on the first floor. The linings have been removed in some areas and are damaged in others. Some of the original linings remain in the Colonial Bank; albeit, covered with modern linings.</i></p>
Rarity High	<p><i>Is the place or area, or are features within it, unique, unusual, uncommon or rare at a district, regional or national level or in relation to particular historical themes?</i></p> <p><i>Despite being typical of late nineteenth and early twentieth century commercial buildings, the Club Hotel, Huddart Parker Building, and Colonial Bank are amongst the few remaining structures of this scale and style in Bluff and together form one of the most imposing streetscapes within the settlement. The Post Office is the only building of a similar style and scale in Bluff.</i></p>

Representativeness Moderate	<p><i>Is the place or area a good example of its class, for example, in terms of design, type, features, use, technology or time period?</i></p> <p><i>The Club Hotel, Huddart Parker Building, and Colonial Bank are good examples of Renaissance Revival commercial buildings. This style was incredibly popular, particularly in Southland and Otago, in the late nineteenth and early twentieth century.</i></p>
Integrity Moderate	<p><i>Does the place have integrity, retaining significant features from its time of construction, or later periods when important modifications or additions were carried out?</i></p> <p><i>The original facades of the Club Hotel and Scott's Private Hotel were replaced following the 1903 fire, and this façade remains today. The Huddart Parker and Colonial Bank buildings escaped major exterior damage during the 1903 and 1914 fires, and their façades retain much of their original integrity. At ground level, there has been some modification of the facades below the verandah; however, above the verandah, little has changed through time. On the interior, there is little surviving original fabric, due to the numerous fires and the extensive alterations carried out in 1938. Much of the first floor remains unchanged from 1938, with only minor modifications. The ground floor has been more extensively altered, particularly in the Club Hotel and Huddart Parker Building. Some original fabric remains in the Colonial Bank, which was least affected by the fires that caused considerable damage elsewhere.</i></p>
Vulnerability Yes	<p><i>Is the place vulnerable to deterioration or destruction or is threatened by land use activities?</i></p> <p><i>The buildings are currently unoccupied and are no longer being maintained; therefore, they are vulnerable to deterioration. As the buildings are not secure, materials have been scavenged (copper) resulting in considerable damage.</i></p>
Context or Group High	<p><i>Is the place or area part of a group of heritage places, a landscape, a townscape or setting which when considered as a whole amplify the heritage values of the place and group/ landscape or extend its significance?</i></p> <p><i>When considered together, the Club Hotel, Huddart Parker and Colonial Bank buildings form their own complex, connected through complimentary design and their associations with Hannah Barron Ward and Sir Joseph Ward. As a group they are a physical reminder of Bluff's role in New Zealand's political, transportation and commercial history. These buildings are also tied to the adjacent Post Office, which shares a complimentary design. The 1903 façade across the hotel and Scott's private hotel was designed by Peter Walker, who was also the architect for the Post Office.</i></p>
Cultural Values	
Identity Moderate	<p><i>Is the place or area a focus of community, regional or national identity or sense of place, and does it have social value and provide evidence of cultural or historical continuity?</i></p> <p><i>The Club Hotel and its predecessors represented continuous use as a hotel from the early 1860s through to the mid- 2000s. Its abandonment reflects the downturn experienced by Bluff as the twentieth century progressed and shipping became less important for transportation of people and goods, resulting in less temporary visitors requiring the accommodation and services it once provided. While the hotel block is a local landmark, its connections with Sir Joseph Ward raise the profile of the hotel, Colonial Bank, and Huddart Parker Building to a national level.</i></p>
Public Esteem Moderate to Low	<p><i>Is the place held in high public esteem for its heritage or aesthetic values or as a focus of spiritual, political, national or other cultural sentiment?</i></p> <p><i>While the Club Hotel has been recognised by HNZPT and the ICC for its significance, the public esteem for this building has waned, and its current condition (unoccupied; ground floor boarded up) detracts from the overall public esteem. The façade of the Club Hotel</i></p>

	<i>block contributes to the heritage streetscape, and its past and relationships to numerous famous figures in New Zealand history were also partly responsible for it being added to the HNZPT List.</i>
Commemorative Low	<p><i>Does the place have symbolic or commemorative significance to people who use or have used it, or to the descendants of such people, as a result of its special interest, character, landmark, amenity or visual appeal?</i></p> <p><i>The Club Hotel may have commemorative value for members of the Bluff community who used to use it as a gathering place, but the extent of this value is not possible to determine without community consultation.</i></p>
Education Low	<p><i>Could the place contribute, through public education, to people's awareness, understanding and appreciation of New Zealand's history and cultures?</i></p> <p><i>The Club Hotel block has the potential to contribute to an increased understanding and recognition of our country's political, social and commercial past.</i></p>
Tangata Whenua No	<p><i>Is the place important to tangata whenua for traditional, spiritual, cultural or historical reasons?</i></p> <p><i>The Club Hotel and associated buildings do not have any known importance to tangata whenua; however, Bluff's history is one in which tangata whenua and European interests are entangled. The historical record does not link any tangata whenua directly to the buildings or location, but the Bluff community was distinctively bi-cultural and so Māori almost certainly were among those who interacted with the complex.</i></p>
Statutory Recognition Yes	<p><i>Does the place or area have recognition in New Zealand legislation or international law including: World Heritage Listing under the World Heritage Convention 1972; registration under the Historic Places Act 1993; is it an archaeological site as defined by the Historic Places Act 1993; is it a statutory acknowledgement under claim settlement legislation; or is it recognised by special legislation?</i></p> <p><i>The Club Hotel is a Category 2 building on the HNZPT List (listed in 2015) and is a recorded archaeological site (E47/198) on the New Zealand Archaeological Association's site recording scheme (ArchSite). It is also scheduled on the Invercargill City Council's District Plan as a heritage building.</i></p>
Historic Values High	<p><i>People Is the place associated with the life or works of a well-known or important individual, group or organisation?</i></p> <p><i>The Club Hotel block possesses multiple layers of historic value, assessed as outlined in Section 3.2. It has strong connections to several important figures and organisations, including Sir Joseph Ward, architect Frederick William Burwell, the Huddart Parker Company and the Colonial Bank. Its founder, Hannah Ward Barron, was a prominent figure in contemporary society, at both a local and national scale, and these buildings stand as a testament to her determination and impressive business skills. Important events in New Zealand history can also be linked directly to this complex, including the downfall of the Colonial Bank in the 1890s and the constitutional changes it caused through Joseph Ward, and the establishment of trans-Tasman steamer services. The surviving façade is the work of local architect Peter Walker who, while not as well-recognised as Burwell, arguably had just as much of an impact on the built landscape of Southland as his celebrated predecessor.</i></p>
Events Moderate	<p><i>Is the place associated with an important event in local, regional or national history?</i></p> <p><i>Important events in New Zealand history can also be linked directly to this complex, including the downfall of the Colonial Bank in the 1890s and the constitutional changes it</i></p>

		caused through Joseph Ward, and the establishment of trans-Tasman steamer services through the Huddart Parker Company.
Patterns		<i>Is the place associated with important aspects, processes, themes or patterns of local, regional or national history?</i>
High		The Club Hotel block is associated with the historic theme of trade and commerce. The Club Hotel and its antecedents flourished under the demand for accommodation in the busy port town, so much so that Andrew Scott had his own private hotel constructed next to the Club Hotel, which was aimed at providing accommodation to families. The Huddart Parker Company were the first trans-Tasman ship operators, fuelling trade and travel between Australia and New Zealand. The Club Hotel block was a commercial hub for Bluff, with numerous businesses having operated out the buildings, including a confectionary shop, pharmacy, drapery and fancy goods, hairdressing and tobacconists, billiard saloon, and the offices of the Huddart Parker Company and Invercargill Dairy Supply Company.
Technological Value		
Technology and Engineering		<i>Does the place demonstrate innovative or important methods of construction or design, does it contain unusual construction materials, is it an early example of the use of a particular construction technique or does it have the potential to contribute information about technological or engineering history?</i>
Low		The Club Hotel and associated buildings do not demonstrate innovative methods of construction or materials and as such possess limited technological or engineering value.
Scientific Value		<i>Does the area or place have the potential to provide scientific information about the history of the region?</i>
No		The property and buildings thereon have no identified scientific value, as it does not have the potential to provide scientific evidence nor does it relate to a scientific development.