

**BEFORE THE COMMISSIONER APPOINTED ON BEHALF OF
INVERCARGILL CITY COUNCIL**

UNDER The Resource Management Act 1991
(the **Act**)

IN THE MATTER of an application for Resource Consent
to demolish a Category II heritage
building under Heritage New Zealand
Pouhere Taonga (HNZPT) list -
Business 2 & Industrial 1 Zones at 100-
116 Gore Street, Bluff; RMA/2023/72

BETWEEN **BLUFF OYSTER AND FOOD
FESTIVAL CHARITABLE TRUST**

Applicant

AND **INVERCARGILL CITY COUNCIL**

Local Authority

BRIEF OF EVIDENCE OF JUDITH MEG BACK



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Introduction

1. My name is Judith Meg Back (known as Meg), I am a Senior Landscape Architect at WSP New Zealand.
2. I am based in Christchurch with WSP (NZ) Limited (“WSP”) where I hold the position of Landscape Architect (Registered).
3. My Qualifications include Bachelor in Landscape Architecture (Hons)(Unitec Institute of Technology) and Bachelor in Agricultural Science (Lincoln University). I hold a level one certificate in Crime Prevention through Environment Design (CPTED) and have held warrants in temporary traffic management since 2019, currently holding a Waka Kotahi COPTTM Inspector Warrant.
4. I am a registered Landscape Architect with nine years practice experience. My registration majors were Master planning and Landscape Design. I have recently finished a three year term on the national executive committee for Tuia Pito Ora New Zealand Institute of Landscape Architects (TPO-NZILA) where my portfolio included running the Urban Design Working Group and the Climate Change Working Group which I retain an active role in.
5. My recent relevant experience includes roles as lead landscape architect for three Urban and Landscape Design Framework reports (ULDF) and leading the landscape and urban design for the Brightwater Ellis Road urban improvements. Local projects include leading the landscape and urban design component of the Stead Street Stop Bank and Airport Avenue works. I have a particular interest in provision of people friendly, sustainable regenerative design which was reflected in a recent conference paper co-delivered to the TPO-NZILA on the place of landscape architecture in the transformation in Aotearoa’s tourism.
6. Although not an Environment Court proceeding, I confirm I have been given a copy of Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have reviewed that document

and confirm that this evidence has been prepared in accordance with it and that all opinions that I offer in this evidence are within my expertise. I have not omitted to refer to any relevant document or evidence except as expressly stated.

Scope of Evidence

7. In my evidence I provide an overview of how I arrived at the landscape enhancement area design (as appended to the resource consent application). I subsequently discuss matters raised in the Section 42A report including the relative size of the areas, design principles for incorporating heritage values including adaptive re-use of materials and interpretation, public access and associated considerations including CPTED, and decisions around the amenity provided including ecological provision (planting).

Background

8. Section 2 of the resource consent application (the **application**) as drafted by Luke McSoriley, provided background on the applicant, the Bluff Oyster and Food Festival Charitable Trust (the **Trust**). It also provided background on the Bluff Oyster and Food Festival (the **Festival**). The Applicants evidence has provided further background on both. I adopt those descriptions for the purposes of my evidence.

The Design Process

9. Luke McSoriley and myself initially offered landscape and urban design guidance to the Trust in the form of a design workshop which was held on the Festival site on April 17th, 2023. The design workshop was attended by trustees John Edminstin and Kylie Fowler. At the same time, the WSP team (Luke and myself) undertook a wider site visit, exploring Bluff and the wider surrounds to ensure good contextual knowledge.

10. The workshop included discussion on the following items and resulted in a series of sketches of the site and possible outcomes created in tandem with the trustees:

- (a) Overall objectives of the Trust for the site.
- (b) Current aspects of the site operation including entry, exit, programmed and unprogrammed space, linkages, aspect and surrounding amenity. Included diagramming on A1 sized site maps at various scales.
- (c) Discussion on history and culture and the stories the site would hope to tell.
- (d) The need for a responsible solution which minimised carbon input in the face of climate change and provision wherever possible of ecosystem services.
- (e) Possible function of the various parts of the site including considerations of CPTED, safety and maintenance
- (f) Definition, description (and accompanying example images of other projects to illustrate) of adaptive re-use and how it might work on this site.
- (g) Wayfinding and interpretation.
- (h) Discussion on other design principles such as human scale, forming a concept, circulation and desire lines, vistas, cohesive materiality and the level of amenity which might be appropriate for each site.

The Landscape Concept

11. A landscape concept report was formed based on the workshop and other site information (as appended to the resource consent application). This included existing conditions overview, key principles, a concept plan, concept zones, indicative sections, material palette (with precedent images to illustrate) and proposed site visualisations. This document was

reviewed by Dr Wendy Hoddinott, a registered landscape architect with specialisation in heritage landscape architecture.

12. To define “Adaptive Re-use” as it was used in the landscape concept document: Adaptive Re-use in landscape architecture (as compared to adaptive re-use of buildings), involves the elements of the removed buildings being typically repurposed in multiple ways – including being built into furniture, in paving or as sculptural elements. Where possible, structural parts of the buildings may be retained as pillars or pergola support. In many world wide award winning examples, landscape projects using adaptive re-use source very little in the way of material input from outside the project site, and minimise materials leaving the site. While integrating site history, this additionally optimises carbon input, especially compared to the high carbon cost of a typical urban streetscape development. Famous examples include D.I.R.T studio’s Urban Outfitters Headquarters (USA), Duisberg Nord Park in Germany (Peter Latz) and the Paddington Reservoir Gardens (TZG Architects) in Sydney.
13. The idea of adaptive re-use was central to the landscape concept, with a desire for all elements, especially in the proposed landscape enhancement area, to be sourced from the hotel, the site, or nearby, to as much as possible build in the history of the area through form and materiality. Due to the unknown nature of the condition of the existing building, retention of building structural elements was not suggested in the concept in case it could not be executed in reality. However Mr Edminstin did at the time express a keenness to seek and put aside any elements of the building that could become features of a landscape area. He also suggested using brick as aggregate in concrete, a technique recently very successfully used in the new (award winning) Ravenscar Gallery in Christchurch to integrate the history of the previous Ravenscar House. Mr Edminstin also suggested sourcing local wharf timbers which we agreed would be a great way to represent the history of the area.

Response to Matters

14. In the s 42A report under 2.1 Proposal, Ms Ellis describes the proposal with some inaccuracies or misunderstanding; as compared to what we aimed to show in the concept design. These are clarified as follows:

- (a) There is mention of a corrugated iron fence on top of a rock wall. While the fence is not fully defined (as adaptive re-use principle indicates found material may be used), in our material palette and visualisations we show examples of timber fencing, with the idea of a gabion (wire basket) wall for retaining that might be filled with local stone, found material from building demolition or oyster shell etc for local interest.
- (b) While the area can be technically described as having predominately “hard landscaping” as opposed to typical soft landscaping such as plants, materiality as shown in concept includes permeable and impermeable surfaces (rather than all “hard surfaces” as stated).
- (c) Interpretation boards (which generally discuss history and culture of an area), and wayfinding and information boards are indicated in the concept. The content on these is typically not shown at concept level but developed as part of ongoing stakeholder engagement (which is proposed by the Trust in the condition agreed with NZHPT). The proposed recording of oral histories would be one example of a good source of information for interpretation boards.
- (d) The landscaping proposed in the previous application was described by Ms Ellis as not dissimilar to the current proposal, but in my opinion, has some fundamental difference in terms of urban and landscape design principles (and the quality of the subsequent space created). The previous concept was of a similar depth from the street but did not specify adaptive re-use or use of found or historic materials, and did not include amenity such as seating, wayfinding signs or bike parking. With a series of ramps, there is little to break up the 40m length shown in the previous design. The ramping formed an area 1.4m above the

foot path level at the rear of the 5.5m deep area, with a wall raising behind another 2.4 metres, resulting in a height of 2.8m above path. While it included a series of historic images, interpretation and wayfinding was not specified. By contrast, the current concept seeks to create areas at human friendly scale with the length dissected by amenity such as seats and signage, different materiality and a lower treatment at the rear of the area which still effectively manages the level change between the front and rear of the site.

(e) The murals shown in design visualisations are, as noted, suggested. However as mural application in the area would typically be driven by liaison with artists (such as “South Sea Spray’ or similar) and the building owners, it was not an item that I felt could be guaranteed in the development of a concept for consenting purposes. Murals on these two building walls would be a suitable contemporary response, appropriate in the area to ensure further inclusion of history and culture, and are shown in the concept as an item which the project aspires to.

15. As noted, further development of the concept can be undertaken once the extent of found material can be confirmed. This can be developed in consultation with HNZPT and mana whenua as proposed in conditions.

16. In my experience, mana whenua input enriches a landscape project for both locals and visitors. I note with the Te Araroa Trail terminating just down the road, there is considerable benefit in provision of a historically and culturally rich landscape amenity area.

17. In response to the comments of Council’s Heritage and Urban Design Planner (landscape architect) Shannon Baxter:

(a) Interpretation is planned to be included and noted on the concept plan and concept zone plan. Subsequent concept development can include more detail around that signage and wayfinding signs. I note that any signage must also be compliant with Waka Kotahi’s regulations for signage adjacent a state highway.

- (b) While the actual use of materials will depend on the degree of salvage possible, the concept aims to show that found materials (from the demolition) will be incorporated into vertical elements and seating as well in the form of aggregates or fill. The concept currently shows wharf beams being used in this manner however revised landscape plans can show more detail around how elements may be re-used once it is better known what might be salvaged.
- (c) While I do not disagree with the analogy of missing teeth, the streetscape and historic values of the Club Hotel are currently compromised by the lack of access and the disconnection this causes to the streetscape.
- (d) The landscape amenity area is future proofed so it can be used as festival site access in the future if required. This includes allowance of sufficient space without furniture for an accessible ramp and seating steps which can become access stairs, and fencing materiality which can easily include gateways. However any reconsideration of the movement and flow of people during events is being reserved for future planning by the trustees, with the current configuration of event use working well for them.
- (e) I agree the historical context of a building cannot be replicated by a landscape, which seeks only to mitigate. However the design uses multiple methods to integrate the historical values of the site while forming an attractive amenity rich area. It does not seek to create artificial copies of what was, rather aims to represent history and culture through form, and materiality (both vertical and on the ground plane) using wherever possible found local objects to further embed history. This design will be enhanced by interpretative and wayfinding signage giving both history and valuable information.
- (f) I also find it interesting that the original hotel building was in fact four buildings, and to reference this we have shown the outlines of the walls perpendicular to the road of these four buildings on

the ground plane in a distinct materiality (suggested as brick) in the concept. The depth of the landscape amenity area (~5m) was chosen for two principal reasons: human scale (many researchers, including Gehl Architects have proven that large expanses can feel unfriendly), and management of the height difference between the back of site and the existing footpath on SH1 Gore Street. The depth of approximately 5 m allows the retaining wall to sit at a safe height of less than 1 m with accessible gradient of 5% towards the street.

- (g) With respect to the responsibility of the Trust to create a suitably sized area they can maintain which was a discussion point in the design workshop. In development of the design, the trustees showed a good understanding of the responsibility and ramifications of maintenance, including wear and tear and vandalism. Maintenance was also a reason for not including planting in this design.
- (h) With regard to the fence and retaining and visibility into the site, there is not currently any visibility into the site from SH1 Gore Street, so this does not constitute any change. The landscape amenity area which will be open to the public, has been designed with CPTED principles in mind including creation of a well maintained attractive space, with no opportunity for concealment or entrapment. In terms of CPTED this is an improvement for the street area on the current Club Hotel Building. While a timber fence is indicated, actual fence design can be reviewed in subsequent concept revisions once available materiality is known and can include elements of visual permeability or other methods of articulation such as different/alternating panel types or (if suggested by mana whenua) integration of cultural pattern or form.
- (i) Our suggested materiality for the retaining wall shows gabion baskets with a “local flavour” such as oyster shells or other found local materiality. However as noted in the concept document, development of this retaining wall may need engineering input

and the final composition of any retaining will be guided by such input. (Civil engineering input may be sought with respect to drainage and run off from site, though inclusion of permeable ground materials are already indicated).

- (j) As discussed in Mr Edminstin's evidence, the festival site at the rear is already used on a regular basis for events. The size / scale of the event site supports this. It is normal for event venues to have relatively large unprogrammed areas (i.e. with no permanent seats or other amenities such as play equipment, tables etc), an example being the development of Te Komititanga at the base of Queen street in Auckland which has a similar scale. While it seems odd to compare Auckland with Bluff, it must be noted that according to the evidence of Mr Edminstin, this site needs to safely accommodate up to 4000 people. I consider the site's scale and amenity to be appropriate for the current use, and that it will benefit in terms of safety and suitability for purpose from the removal of the unsafe buildings, with the future possibility of an additional access route if required.
- (k) With respect to other suggested amenity for the landscape enhancement area, verticality from found materiality (such as items from demolition or wharf timber) is suggested to break up areas into spaces which feel friendly, without compromising CPTED. To preserve the ability of the site to be developed in the future if appropriate (filling the "missing tooth"), the items are also designed to create a pleasant area, without precluding or making impractical any future development. This helps future proof the land, enabling it to be responsive to any increase in the need for commercial development on the street. If found materiality supports the development of a robust enough pergola structure which does not compromise CPTED, this may be included in revisions of the landscape plan.
- (l) The site is designed to complement the other elements of the wider street environment. Interpretation, shelter, play amenity (skate park) and vegetation are all evident on the other side of

the street where there is no building development. By contrast, the concept design response on the club hotel site is to provide different, interesting and historically significant materiality, which forms improved amenity for those using the shops, backpackers hotel or accessing the internet (via the neighbouring council service centre); in the form of seating, bike parking and interpretation and wayfinding of local interest. This amenity also allows locals and visitors to mix and meet.

- (m) Vegetation, which has not historically been present on this site, would require importation of soil, preparation of planting beds and an establishment period with increased maintenance (weeding and watering) requirements and long-term maintenance whilst also being vulnerable to vandalism. Given a good amount of greenery is already present in the area, including views across the road to planting, this was not considered an appropriate or necessary response on this site. While planting is a good way to reflect natural history, adaptive re-use of materials from the hotel and district better references this site's history.

Summary

18. My conclusions and the subsequent response in terms of the landscape design have been informed by desk top study, observations of the site made during field work, discussion and design collaboration with the Trustees as well as previous experience in design, documentation, construction, research and evaluation of landscape amenity areas, both urban and rural. I am open to design development iterations of the concept including further stakeholder input such as mana whenua collaboration. Design development would include refinement based on opportunity created by the actual salvage of materials during demolition.
19. The expert assessment is that there will be a loss of heritage values with the loss of the Club Hotel building. However the site as it stands also creates a severe dislocation in what should be a coherent and pleasant small town street experience for both locals and visitors.

20. The landscape concept uses the principle of adaptive re-use to ensure as much as possible items from demolition are retained and re-used. The landscape response seeks to create a public area at human scale rich with amenity, historic and cultural reference, environmentally responsible, future resilient and built by community which will be complemented by an extended events space. The two areas that will be formed (the landscape enhancement area and the enlarged festival site to the rear) will be adaptable, and appropriate for the established and future uses.

Judith Meg Back

Dated 1 November 2023