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18 March 2019

Before the Invercargill City Council the matter of the Resource Management Act 1991 and an application to the Invercargill City Council by HWCP Management Ltd for Resource Consent to demolish, alter and redevelop land and buildings in the CBD on a block bound by the east side of Dee Street, the south side of Esk Street, the west side of Kelvin Street and the north side of Tay Street.

EVIDENCE of Robert John (Bob) Simpson, architect and submitter on this application.

1. **Witness details:** My name is Robert John (Bob) Simpson and I am a registered architect.
2. I was brought up in Invercargill and I am the eldest of Bert & Ellen Simpson's seven children. My parents started and ran the Oxford Cake Shop at 93 Dee Street, Invercargill, from 1948 till they retired in 1977.
3. From 1953 to 1960 I attended Waikiwi Primary School and won a school election held just before the 1960 General Election.
4. From 1961 to 1965 I attended Southland Boys High School and passed Higher School Certificate and in 1965 I was a prefect and captain of the Rugby 1st XV.
5. I have a five-year Bachelor of Architecture degree from the University of Auckland, School of Architecture, 1970.
6. I have a Diploma in Building from the Carrington Technical Institute in Auckland (now Unitec).
7. I am a Fellow of the New Zealand Institute of Architects.
8. After working in Auckland in a variety of jobs for four years, I returned to Invercargill late in 1974 and I have worked here as an architect, a polytechnic tutor, a project manager, a builder and a coordinator.
9. I have held a range of leadership roles in the NZ Labour Party in Southland since 1975 and have been active in local body politics.
10. From 1978 to 1982 I was the Chief architect of the Southland Education Board.
11. Since 1982 I have had my own practice as an architect, based in Invercargill.
12. I have been involved with the development, design and building of many projects in the Invercargill Inner City and in the southern region.
13. From 1987 to 1993 I was a New Zealand Institute of Architects appointee on the board of the Building Research Association of NZ (BRANZ) and for the two years I was deputy chair.

14. From 1986 -1995 I was a trustee and a director of Trust Bank Southland Limited, a director of Trust Bank New Zealand Ltd from 1988 to 1994 and the **foundation chair of the Trust Bank Southland Community Trust from 1988 to 1994**. The Trust changed its name to the Community Trust of Southland in 1996 and in 2018 it changed to Community Trust South.
15. After the reorganisation of local bodies in 1989, I unsuccessfully challenged Mayor Eve Poole for the **Invercargill mayoralty. My platform was Planning for Growth**.
16. I chaired the 'Southland to 2006 Book Project Committee which published '**Murihiku the Southland Story**' a **400-page history of Southland**. I wrote several sections of the book and took many of the building photographs.
17. I have been involved with many groups and made many submissions on planning and related issues in Southern New Zealand since 1975.
18. **Code of Conduct for Expert Witnesses:** I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the code and am satisfied the matters I address in my evidence are within my expertise. I am not aware of any material facts that I have omitted that might alter or detract from the opinions I express in my evidence.
19. **Scope of evidence:** My evidence relates to the proposed redevelopment of the city block bounded by Tay, Dee, Esk and Kelvin Streets, in the CBD of Invercargill.
20. The proposed works will see the demolition of many buildings listed in the heritage schedule on the Invercargill City Council District Plan and other not notified buildings.
21. **Many of the proposed buildings in this application are well outside the ICC's bulk and location rules.**
22. **The Resource Consent Application of 2 October contained many conflicts between the different documents.** Submitters on this 'Proposal' were required to have their submissions in by 16 November 2018.
23. Since then there have been many changes to the 'Proposal' through the media and the formal notification which concluded on 11 March 2019.
24. **Witness Opinion:** In preparing this evidence I have reviewed the Proposal on the ICC Website.
25. The applicant has modified the 'Proposal' significantly since October 2018.
26. Another floor has been added to the proposed carpark building and the proposed building on the corner of Tay and Kelvin Street has increased in size and height.
27. Both these changes will increase the shading on adjacent streets and in winter the risk of ice and accidents.
28. In my opinion these significant changes should have required a fresh Resource Consent Application so the community could understand the significance of the changes and submit on them. The current submitters might have modified their submissions.

29. Given the current 'Proposals' deviation from the ICC Operative Plan I think a Plan Change application should have been considered.
30. Many of the issues raised by submitters have not been addressed in the additional information provided by the applicant by 11 March 2019.
31. **Good News:** It is good that a large parcel of land and buildings have been amalgamated in one ownership. This allows the opportunity for some coordinated staged planning and construction.
32. It is also good the HWR Group, founded by Bill Richardson, plans to build a multi storey office tower and to relocate their office workers from the suburbs and elsewhere into the inner city. This will add to the pedestrian activity in this area.
33. **Bad News:** Invercargill City Council is a major participant and investor in this proposed redevelopment. It is not good that they are competing with local ratepayers.
34. The Invercargill City Council are effectively a 49.9% shareholder in the applicant company. They also have a conflict of interest as they are the regulatory body for resource consents and for building consents.
35. Since 1974 the Council have allowed the once compact inner city to spread out. This has reduced pedestrian counts and reduced the value of the buildings and of the businesses.
36. This HWCP proposal is ambitious and it has generated significant interest and support.
37. There is significant opposition to the proposal, but most locals are reluctant to speak up, in many cases because of the potential to affect their businesses.
38. In my opinion the most important challenge in any project is to **"clearly define the problems or needs of the client and the community"**.
39. **I do not see evidence the problems or needs have been clearly defined.**
40. **Vibrant Invercargill and Mainstreet:** In the 1990's Vibrant Invercargill was established as the local version of the International Mainstreet organisation.
41. Mainstreet was developed to help Inner Cities compete with suburban malls which had free carparking. These malls were thriving while old inner cities areas were failing.
42. The Vibrant Invercargill Team and the Inner-City Steering Committee I was part of in the mid 90's succeeded in promoting some positive change in the inner city. Only some parts of this plan were completed.
43. **A Mall does not seem like an appropriate model for this inner-city block:** This proposal is promoted as a mall. Most malls are established on large cheap sites away from city centres. They have an anchor tenant at each end, usually a least one supermarket and large free

carparks. These malls provide good access for large service vehicles. Most malls are internal spaces with little interaction with the adjacent streets.

44. **An Alternative Proposal:** I think a revitalised shopping and social plan is needed which includes a refreshed Boffa Miskell proposal of three north south arcades, from Tay Street through Cambridge Place to Esk Street and through the SIT Arcade to Don Street and through the Todd's site to Spey Street. There is plenty of opportunity in these areas for sheltered shopping and socialising, without spending \$200 million dollars.
45. Before this block is redeveloped, I believe the ICC need to engage competent town planners to prepare a long-term inner-city plan which considers the Boffa Miskell proposals and the Invercargill Inner-City Steering committee plans of the late 1990's. These new plans should analyse the current and likely future needs and consider pedestrians, bus patrons, cyclists and vehicles.
46. We need research by some informed people and some options to:
 - a. Consider the need for Southern cultural facilities which include the discussion on retaining the art galleries with the Southland Museum or separating them;
 - b. Produce a full city plan and a southern regional plan which:
 - c. Includes a public square in Invercargill away from the main highways;
 - d. Includes an art and exhibition centre and a museum.
47. A bridge above Kelvin Street connecting this block to H & J Smiths could enhance the area.
48. The old Southland Times and ASB Building on Esk Street and the Farmers building on Tay Street and facing on to Cambridge Place, could house the Southland Museum and Art Gallery and exhibition spaces.
49. The current Pyramid off Gala Street could be strengthened and used as the store and workshop for the southern region's museums and art galleries.
50. **The HWCP Proposal:** The drawings look like a collection of ideas from large modern city blocks, which don't seem appropriate for the scale of the inner city in Invercargill.
51. **Difficult to find a good building team.** Finding good builders and sub contactors to complete this large project within a reasonable timetable will be a difficult. The building industry is not in good shape. There are other major projects happening in Invercargill and the \$1.4 billion hospital project in Dunedin will attract many builders and sub-contractors.
52. **Carparking seems excessive:** This application with a carparking building for almost 1000 cars seems excessive when in many places there is encouragement for people to use public transport and bikes.
53. I haven't found out if these parks will be free, as they are in many malls.
54. In my opinion the vehicle access to the parking building is too close to Kelvin Street and there will be significant delays because of traffic turning left into Kelvin Street and the adjacent traffic lights.

55. **Heritage Issues:** This redevelopment proposal does not meet the Heritage requirements of the District Plan.
56. As a part of Heritage Month about 160 people enjoyed local architect and historical building expert Mick Hesselin's guided walks around the block. Most of these people were horrified at the proposal to demolish all but three buildings in this block.
57. These existing buildings represent a significant part of our history and culture. I believe it is important to find good uses for some of these buildings. This will require some design skills and money. In many cases it will be cheaper than the costs of dealing with contamination, archaeological studies, demolition and new buildings.
58. Southlanders are used to parking near where they choose to shop. The concept of driving around a block and up five stories for a park will be challenging for many people. Then they will need to find a lift to get back to the areas they want to visit. I wonder if the applicant has estimated the time to get to a park and back to the medical centre.
59. If this redevelopment proceeds as planned, there will be many years of disruption to the businesses in the affected block and to the neighbouring businesses. Their customers, members of the community and visitors will also be disrupted.
60. In a big city, demolishing most of a city retail block and redeveloping it, may have a good outcome. However, with my knowledge of Invercargill, demolishing and interrupting almost half of the of the retail precinct and building a large modern shopping mall, may not create the dream being promoted.
61. This project has the potential to see many local businesses go out of business.
62. Modest sized family businesses which have provided good services to the people of Southland, do not have the resources to pay the rents, meet the turnover targets and be open for the hour's mall managements require.
63. The businesses which move out of this area, may chose not to return in five years' time.
64. My concern is, if this proposed redevelopment is completed, it may further erode the quality of the inner city, rather than enhance it.
65. **Bulk and Location and other planning Issues:** This proposal does not comply with the relevant sections of the District Plan. I think there should be verandas at about 3.5 metres above all the footpaths, to provide shelter from the wind and the rain.
66. **Disruption issues:** This is a complex application. I don't believe adequate consideration has been given to how the neighbouring businesses will deal with noise, dust, access, disruption to parking and the lack of food premises.
67. If this proposal proceeds there will be more vacant space in parts of the inner city, which will make it more difficult for landlords and business to make a living.

68. The Editorial headline in the Southland Times about this redevelopment of 16-11-18 is “Preparing for the bombsite bit.” <https://www.stuff.co.nz/southland-times/opinion/108630104/preparing-for-the-bombsite-bit>
69. **Planning Background:** Sadly, the Invercargill City Council have not developed a coordinated inner-city plan. It is many years since the Council had planners on the staff or employed consultants who have been asked to prepare a comprehensive long-term plan for our city. Not words, but drawings which indicate the preferred directions competent people are recommending.
70. The Council have employed numerous out of town consultants who have prepared poor plans for small parts of the inner-city.
71. Over the years the City Council seems to have assumed that any development is good.
72. The reality is, because the Council have allowed development outside the true inner-city, the pedestrian count in the inner-city has dropped, the community is missing the excitement a vibrant inner city. Also retailers, business owners and landlords struggle with lower turnovers, lower rents and lower valuations.
73. A recent example is the ICC selling the site and granting Resource Consent for the K Mart development, outside what most of us consider is the inner city.
74. It will be interesting see what happens with the budget and timetable for the new 80 room hotel the Invercargill Licensing Trust have received Resource Consent for.
75. The current hoardings and disruption to pedestrian and traffic flows on the Invercargill Licensing Trust’s hotel site on the corner of Don and Dee Street, provides evidence of the issues which will occur to a much greater scale if this HWCP proposal proceeds.
76. **Conclusion:** I ask the applicant to:
- a. Provide a tentative timetable for the whole project:
 - b. Provide a rough order of cost budget prepared by an independent quantity surveyor which:
 - i. Includes the estimated costs for the consultants and this application;
 - ii. Includes the costs of the demolitions the archaeological investigations;
 - iii. Includes the costs of the different buildings;
 - iv. Makes allowances for contingencies and inflation over the building period;
77. **I think the commissioners should decline this application.**
78. If the application is granted, I recommend the applicant chooses to ‘Take a break’ and consider the submissions to this application.
79. During the ‘break’ the applicant may choose to reconsider this proposal, negotiate with interested parties and continue with some parts of the proposal.