

**BEFORE THE INVERCARGILL CITY COUNCIL**

**IN 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 Central Business District 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

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**STATEMENT OF REBUTTAL EVIDENCE OF JAY BATHTHANA  
ON BEHALF OF HWCP MANAGEMENT LTD**

**TRAFFIC & TRANSPORTATION EVIDENCE**

**25 March 2019**

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## **Introduction**

1. My name is Jay Baththana. I am a Senior Transportation Engineer at Abley Limited (Abley).
2. My qualifications and experience are set out in my statement of evidence in chief (EIC) dated 11 March 2019. I prepared an Integrated Transport Assessment (ITA) for the HWCP mixed-use development, which was issued on 11th February 2019 and is appended to the Planner's Report.
3. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from opinions that I express, and that this evidence is within my areas of expertise.

## **Scope of evidence**

4. My rebuttal evidence is provided in response to expert evidence filed on behalf of:
  - (a) Mr Byfield for NZ Transport Agency; and
  - (b) Mr Simpson.

## **Evidence submitted by Mr Byfield (NZ Transport Agency)**

5. Mr Byfield recommends several improvements that are set out in paragraphs 5.1 through 5.7 of his statement of evidence. I have addressed each of these in turn in the following paragraphs.
6. In paragraph 5.1 Mr Byfield recommends that the west service lane on Tay Street, which Mr Byfield refers to as Access A, be moved to the east. The site plan has been updated and the access has been relocated to the position of

the existing easement. In my view this satisfactorily addresses Mr Byfields's concerns and the revised site plan is attached as Attachment A to this evidence.

7. In paragraph 5.2 Mr Byfield recommends that visibility splays be provided on both sides of Access A. Visibility splays will be provided as stated in paragraph 33 and 34 of my EIC.
8. In paragraph 5.3 Mr Byfield recommends that a visibility splay be provided on the east side of the multi-storey car park access (which Mr Byfield refers to as Access B). A visibility splay will be provided as stated in section 6.4 (Page 30) of the ITA.
9. In paragraph 5.4 Mr Byfield requests confirmation that the one way service lane east of the multi-storey car park (which Mr Byfield refers to as Access C) is one way in the northbound direction and that vehicles will not exit to Tay Street. I can confirm that the service lane will be one way in the northbound direction. Signage and road marking will be used to enforce the one way circulation. A gate will be located with sufficient setback to enable a truck to wait for the gate to open. Trucks waiting for the gate to open will not block pedestrian movement on Tay Street. Similarly, a gate will be located at the Esk Street end of the service lane to prevent any southbound movement. The layout and vehicle tracking of the one way service lane is shown in Attachment B.
10. In paragraph 5.5 Mr Byfield recommends that a formal parking plan is presented to NZTA for comment. Please refer to Attachment B which shows the indicative loss of on street parking at all vehicle accesses on Tay Street and vehicle tracking. It is my opinion that Attachment B provides sufficient information to conclude that vehicle queues will not encroach on through lanes on Tay Street.

11. In paragraph 5.6 Mr Byfield recommends that a plan showing the revised location of the residential car park access on Dee Street is provided for comment. Please refer to Attachment C for the street level layout of the revised residential car park access. As mentioned in paragraph 16 of my EIC, the design of the access is appropriate to maintain a high level of pedestrian safety. However, the residential car park access will conflict with the operation of Bus Central. Considering that NZTA or Invercargill City Council will not have sufficient time to assess the revised Dee Street car park access I propose a condition requiring the applicant to consult NZTA and Invercargill City Council during the design stage of any vehicle accesses on Dee Street. Ms McMillan will suggest some wording for such a condition.
12. In paragraph 5.7 Mr Byfield recommends that a plan showing pedestrian access points in to the car park is provided. Access to the car park will be via the proposed development. Customers will be able to access the car park via lifts, escalators and stairs from/ to any parking level. No pedestrian access will be provided via the multi-storey car park access.

#### **Evidence submitted by Mr Simpson**

13. Mr Simpson raises concerns in paragraph 52 of his statement of evidence that the application provides an excessive number of car parks and in so doing does not encourage public transport or cycling modes.
14. It is my view that the number of car parks is appropriate as set out in section 6.2 of the ITA, and there is good access and connectivity from the site for public transport users as shown in section 3.6 of the ITA. Cycle parking will be provided in close proximity to the main entrances along the perimeter of the development to ensure cyclists arriving from any direction can conveniently identify cycle parking locations.



15. Mr Simpson raises concerns in paragraph 54 of his statement of evidence that the parking building access is located too close to Kelvin Street. This is a matter I have addressed in section 5.1 of my ITA and paragraph 22 of my EIC. In my view the car park vehicle access is located appropriately as it complies with NZTA guidance and has been considered acceptable by NZTA.

Jay Baththana

Traffic & Transportation

Abley

Date: 25 March 2019

## Attachment A





Rev	Date	By	Chk	Description
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Design	JB
Drawn	RT
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Issued	22/03/2019
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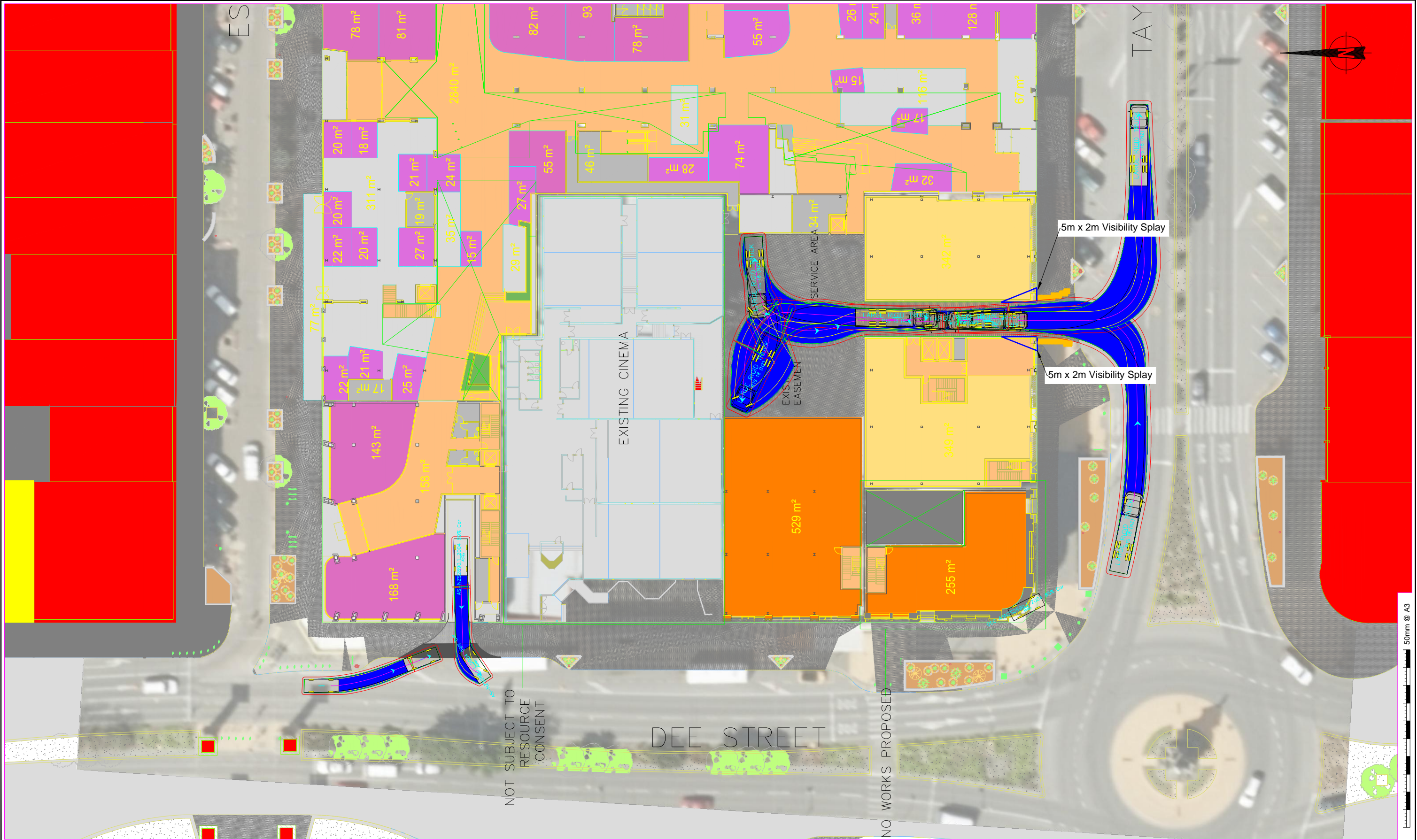
Attachment A
Invercargill Central
Design Modifications
Tay Street Service Lane

Project No.	HML-J001
Dwg #	ATC10332
Sheet	2
Revision	--

## Attachment B







Rev	Date	By	Chk	Description
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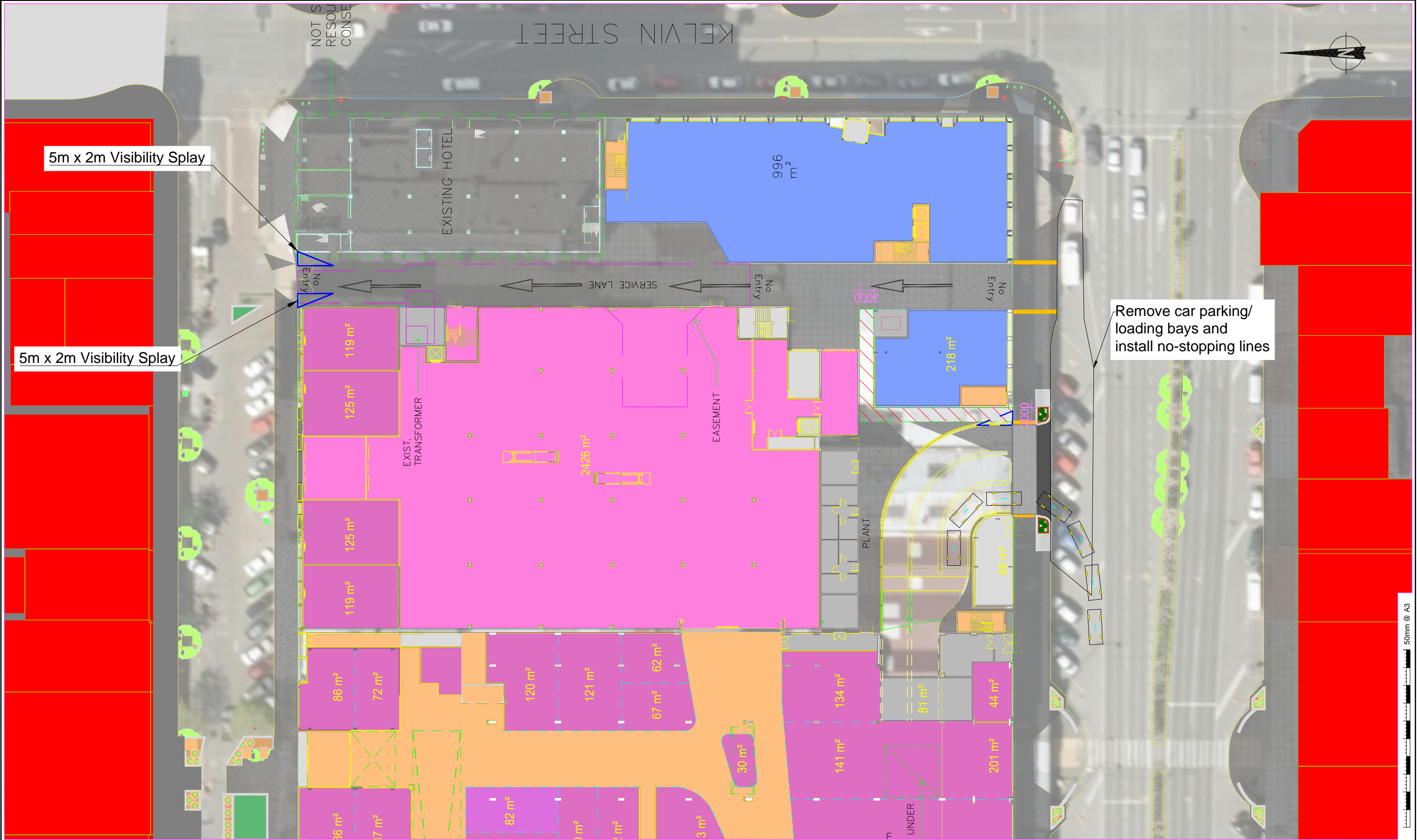


Design	JB
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Issued	22/03/2019
Scale	1:500 @ A3

**Invercargill Central**  
Design Modifications  
Tay Street Service Lane and Dee Street Accesses  
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Project No.	HML-J001
Dwg #	ATC10332
Sheet	2
Revision	--





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Design	JB
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**Attachment B**  
Invercargill Central  
Tay Street Main Car Park Access  
Access arrangemnt and parking removal

Project No.	HML-J001
Dwg #	ATC10332
Sheet	1
Revision	--





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Design	JB
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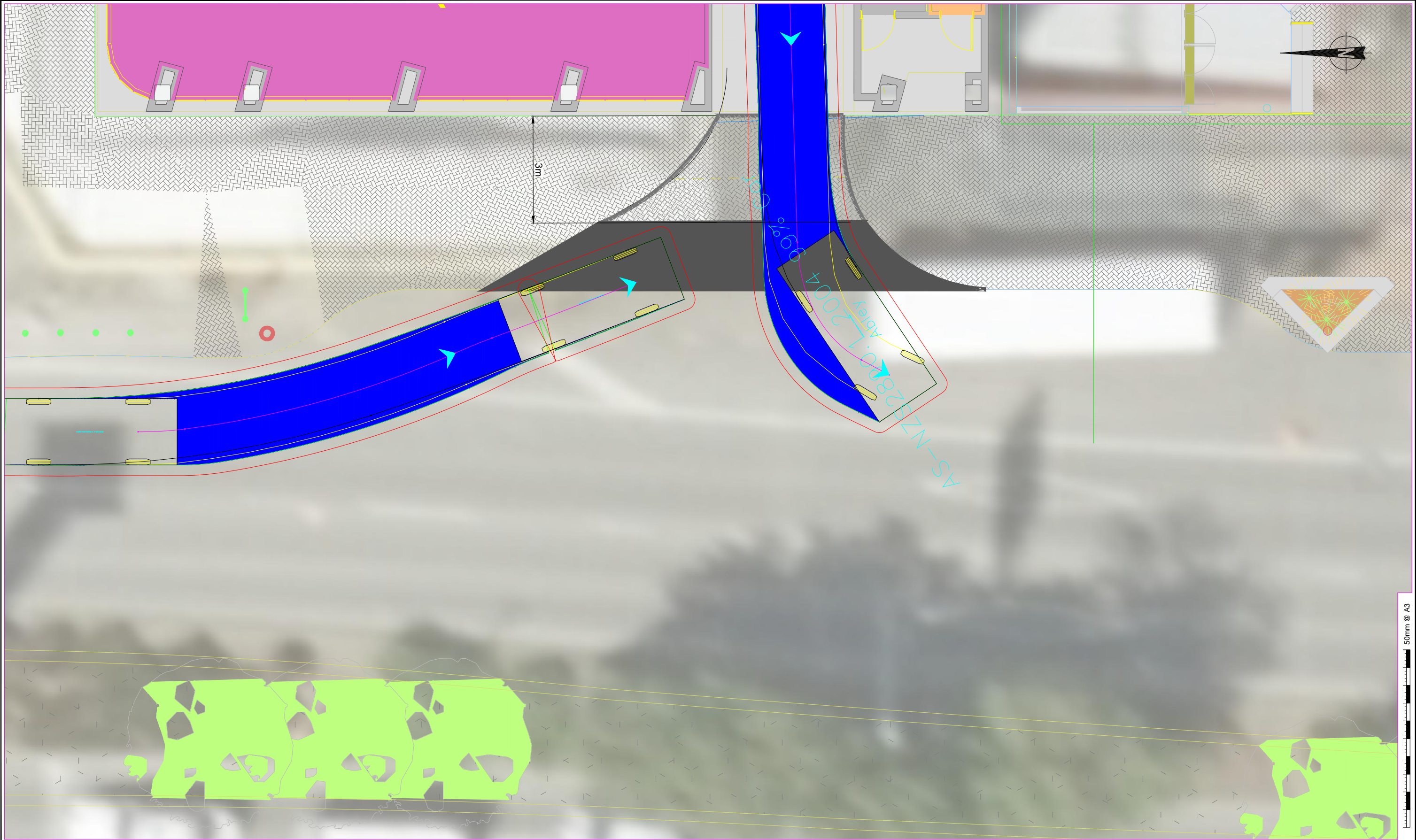
Invercargill Central  
Design Modifications  
Tay Street and Esk Street Accesses  
Semi-Trailer Tracking

Project No.	HML-J001
Dwg #	ATC10332
Sheet	1
Revision	--

## Attachment C







Rev	Date	By	Chk	Description
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Design	JB
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Attachment C  
Invercargill Central  
Design Modifications  
Dee Street Car Park Access

Project No.	HML-J001
Dwg #	ATC10332
Sheet	2
Revision	--