

18 April 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 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.

**Additional STATEMENT of Submitter Robert John (Bob) Simpson, architect and urban design activist, in response to the additional information provided by the Applicant.**

1. The 'original documents' provided by Buchan, I based my original submissions on, were dated 8 October 2018.
2. The 'current documents' provided by Buchan, are dated 29 March 2019. They contain significant changes from the 'original documents.'
3. In my opinion both the 'original proposal' and the 'current proposal' by HWCP do not comply with the policies or rules of the Invercargill District Plan Requirements and particularly in reference to the items listed below. The differences are more than minor.
4. *The Proposed Invercargill City District Plan Appeals version January 2017 states;*
5. *2.22 Business 1 (Central Business District) Zone*
6. *The Zone seeks to maintain and reinforce the viability and vibrancy of Invercargill's Centre by enabling a wide range of activities, by encouraging and maintaining a high level of amenity, and by encouraging good urban design. ...*
7. *Objective 4: Protection of the heritage values of the Central District. ...*
8. *Policy 3 Urban Design: To encourage the incorporation of the following urban design principles into the design of buildings and open space:*
  - 8.1.1. *Buildings and land uses respect their context.*
  - 8.1.2. *Buildings and land uses reflect and enhance the character of Invercargill.*
  - 8.1.3. *Buildings and land uses are clearly linked by appropriate connections. ...*
  - 8.1.4. *Custodianship – Buildings and land uses should be environmentally sustainable, safe and healthy. ...*
9. *Policy 4 Pedestrian-friendly frontages: ...*
10. *Policy 10 Protection from weather: ...*
11. *Policy 15 Height of structures:*
  - 11.1.1. *To control the height of structures in order to create aesthetic coherence along frontages, avoid the creation of adverse microclimate effects, and promote availability of sunlight in the public street.*
  - 11.1.2. *To require the replacement buildings within the Central Business District that are required to have a Pedestrian-Friendly frontage have a two storey frontage to the public street or streets. ...*

**12. Policy 22 Heritage value: To promote the retention of the character and scale of**

**12.1.1. the heritage structures, buildings and places within the City Centre.**

12.1.2. *Explanation: The rich heritage of the City Centre has been widely acknowledged and documented, ...*

**13. Significant Changes between the ‘original documents’ and the ‘current documents.’**

13.1.1. Another floor has been added to the carpark building and the building on the corner of Tay and Kelvin Street has increased in size and height.

13.1.2. Both changes will increase the already significant shading on adjacent streets and particularly on Tay Street. It is likely there will be more ice and accidents in this part of town.

14. This ‘current’ application is well outside the bulk and location rules in the ICC’s the Operative District Plan.

15. In my opinion the most important challenge in any project is to:

**16. “clearly define the problems or the needs of the client and the community”. I have not seen the evidence the problems or needs have been clearly defined and consequently I think the proposed solution is unlikely to be viable.**

17. It is good that a large parcel of land and buildings has been amalgamated in one ownership. This allows the opportunity for some coordinated staged planning and construction.

18. It is also good the HWR Group, plans to build a multi storey office tower and to relocate their office workers from the suburbs into the inner city. This will add to the pedestrian activity in this area.

19. **Vehicle Issues** The proposal provides carparking building for more than 900 cars with the top level being 6 floors above ground level. I have seen no justification for this number of parking spaces. There are other nearby options for carparking without the need to provide so many parks on this site.

20. Will the parks be free as they are round many malls?

21. The access and particularly the egress from the carpark building on Tay Street are likely to create bottle necks because of the nearby traffic lights on the corner of Tay and Kelvin Street and the adjacent service vehicle accessway.

22. Functional Aspects people here are used to parking near the place they want to shop. We have an aging population and about ¼ of our people have physical disabilities. The significant distance to drive to get to a higher level and then to walk to get to where a person wants to go will be a disincentive for many people. If someone chooses to drop a partner at the door of the new hotel, to get into the parking building they will have to drive two blocks north and turn left into Don Street, then turn left into Dee Street then turn left into Tay Street and then turn left into the parking building having negotiated four sets of traffic lights.

23. It seems to me the proposed egress from the site for construction vehicles will be blocked when the ramps to the carparking building are constructed.
24. With the proposed volume of space on this site there will be a large quantity of product that will need to be delivered to and taken away from this site.
25. When the project is near completion, I think there will be inadequate spaces for service vehicles to access the site, to stop, to unload, to loading recycling or rubbish and to egress from the site.

## **26. Hotel Issues**

27. The staging plan shows hotel is the last building to be constructed on the site, after the rest of the site is completely covered with other buildings. This multi storey building will probably be built using Tay and Kelvin Street for cranes and construction activity. This will add to the congestion issues at the corner of Tay and Kelvin Street mentioned above.

## **28. Facadism** (the retention of only the street face of a building)

29. Facadism is not a good solution, to replace heritage buildings, in the opinion of many urban planners, heritage building experts, architects and me.

## **30. Urban Planning**

31. (31 Esk Street) the Coxhead Building is proposed to be saved and upgraded with a total glass frontage on the ground floor. I know this can be done using steel framing but I can advise it will look strange to most of us because glass panels cannot visually support massive walls above. Glass supporting visually heavy traditional façade above
32. I think there is too much glass in the proposed buildings. Even double glazing is not good at stopping the transfer of heat into or out of a building. That is, it is not nearly as good as an insulated wall. The running costs of this building will be high, as it will have to be at a comfortable temperature for long hours.

## **33. Concerns**

34. If this demolition and redevelopment proceeds as planned, there will be many years of disruption to the businesses in the affected block and the neighbouring businesses.
35. Another concern is, that after the proposed demolition of all but three buildings on the block is completed, some of the building work will be put on hold when HWPC:
  - 35.1.1. Finds the real costs of this ambitious redevelopment are greater than expected.
  - 35.1.2. Finds there are not enough tenants who are prepared to pay the rents necessary to give a good return on the project.
  - 35.1.3. Finds the building work timetable is not achievable.
36. Many people are threatened by change. Many people love old buildings, as can be seen by the support to rebuild the Cathedral in Christchurch. I do not think the level of demolition involved in this proposal is warranted.

**37. My submission would be met if:**

**38. HWCP is asked to put this application on hold and to:**

- 38.1.1. Prepare a staged redevelopment plan of this Dee, Tay, Kelvin and Esk Street block, with verandas designed to provide shelter to pedestrians, which causes less disruption and allows measurement of the success of the stages as they are completed.
- 38.1.2. Provide for the reuse of some of the existing buildings and for the recycling of the materials from the demolition of some buildings.
- 38.1.3. Commission the independent business case and feasibility study, financed by the Provincial Growth Fund grant of \$995,000, on both the current and the revised proposal above.
- 38.1.4. Wait until the Invercargill City Council completes its consultation with the community later in 2019 and prepares a recommendation and budget for this proposal.

**39. The Invercargill City Council:**

- 39.1.1. Employs appropriately skilled people to produce some urban design plan options for the whole of the inner city.

This plan should:

- 39.1.1.1.1.1. Include a public space/square away from State Highway 1.
- 39.1.1.1.1.2. Include other amenities, toilets, seats, information centres, bus stops and bus terminals.

**40. The Commissioners:**

- 40.1.1. If they are of a mind to grant this application, they consider the suggestions above, as conditions of Resource Consent.