

**BEFORE THE COMMISSIONERS ON
BEHALF OF DUNEDIN CITY COUNCIL**

IN THE MATTER of Application for Resource Consent
under Section 88 of the Resource
Management Act 1991

BY **NZ HORIZON HOSPITALITY
GROUP LIMITED**

LUC 2017-48 and SUB 2017-26

BRIEF OF EVIDENCE OF ANTONI FACEY

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INTRODUCTION

1. My name is Antoni Peter Facey. I am the Director of Avanzar Consulting Ltd and practice as the company's Traffic and Transportation Engineer.
2. I hold the degree of Bachelor of Engineering (Civil) from Auckland University and I am a Professional Member of the Institution of Professional Engineers NZ. I am a member of the Transportation Group of IPENZ. I am Chairman of the South Canterbury branch of IPENZ. I am a Councillor of the South Canterbury Automobile Association Council.
3. I have been working in the field of Traffic and Transportation Engineering for more than 30 years working within Central Government, Local Government and private consultancies. I have prepared many traffic impact assessments for resource consents under both the Town and Country Planning Act and the Resource Management Act.
4. I have read the Code of Conduct for Expert Witnesses within the Environment Court Consolidated Practice Note 2014 and I agree to comply with that Code. This evidence is within my area of expertise, except where I state I am relying on what I have been told by another person. To the best of my knowledge I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

Summary of my report

5. I prepared my original Integrated Transport Assessment report based on early plans for the proposed hotel development on the Moray Place site. My conclusion from the report were that there would be effects on the traffic environment as a result of the hotel development which were both negative and positive but that the overall traffic effect of the development would be less than minor.
6. The basis of my conclusion was the following.
7. The proposed hotel activity is a permitted activity in both the operative and proposed 2GP district plans subject to meeting performance criteria.

The traffic and transportation criteria are generally met apart from some minor issues and these can be mitigated with appropriate design.

8. The permitted baseline for the site is a range of activities, many of which could have a much larger traffic effect than a hotel which could be considered a relatively benign activity when compared to the options such as a large scale retail activity. A large scale retail activity could potentially generate a significantly higher amount of traffic than the proposed hotel, assuming that such a development could be successfully built on the sloping site.
9. Note that the existing standalone carpark on the site is a restricted discretionary activity in the operative district plan.
10. Traffic volumes on Moray Place and Filleul Street in the vicinity of the proposed development are relatively low and can accept the traffic from the proposed hotel development without any noticeable effect on capacity. Indeed, it is likely that the traffic volumes generated by the proposed hotel development are less than those that could be generated by the existing car park and some other permitted activities. Similarly, the heavy vehicle servicing requirement for the hotel could easily be exceeded by a permitted activity such as a large scale retail facility.
11. Moray Place is intended to be upgraded as a part of this development to include a roundabout at the Filleul Street intersection and other urban design features along the frontage of the hotel. These are significant improvements to all road users on Moray Place, especially pedestrians who must cross Moray Place.
12. The existing Filleul Street car park is an inefficient use of the land. To demonstrate this, a number of nearby car parks were reviewed to determine their efficiency and compared to the Filleul Street carpark. The results are summarised in the table below:

Address of carpark	Area of carpark divided by the number of parking spaces
8A Smith Street	22.7m ² /space

Albion/Gt King intersection	24.9
ANZAC/Bow intersection	24.9
52 Great King Street	25.7
Filleul Street carpark	37.6

13. This table clearly demonstrates that using the site as a carpark is an inefficient use of the available land.
14. The Council has an existing parking strategy that is a live document and is constantly under review. The Council reviews the parking supply and demand, both of which change over time. The Council also use the parking strategy as part of their decision making process when investigating travel demand management and encouraging mode shift to public transport or active transport modes. Loss of the Filleul Street carpark as a public carpark will be just one of many specific issues on both the supply and demand sides that the Council will consider in its next review of the parking strategy.
15. Note also that the required on site parking for the proposed hotel is reduced under the proposed 2GP district plan compared to the operative plan. For a hotel in the CBD, Rule 18.5.6 of the 2GP specifies that a minimum of 1 parking space per 6 visitor accommodation units is required where the activity is based on guest rooms (eg hotels). There are no requirements for car parking for retail or residential activities in the CBD zone. There is a requirement for only a single coach loading space and no on site coach parking. Hence, for a 278 room hotel (assuming all the 64 self contained units are available to the hotel), a total of 46 parking spaces would be required. This again demonstrates the Councils commitment to managing the carparking supply and demand in the longer term.
16. On site manoeuvring for cars will be carried out safely and efficiently on site using a valet service. Buses and service vehicles can only travel around the site in a clockwise forward direction and need to drive onto Moray Place through the roundabout to reenter the site from their parking space on site. This is a minor inconvenience and can be carried out

safely. Note also that it is unlikely that buses will be parked on site. Experience suggests that the drivers will stay elsewhere and will take the bus away for cleaning and storage overnight. Hence, there are no on site bus parks required in the 2GP but 5 of the 6 required by the operative district plan have been provided. See also the comments by the Dunedin City Council Transport Planner on this issue.

17. Because the proposed development complies with all of the traffic and transport standards for a permitted activity except for one minor issue where the sixth coach park cannot be marked on site, it is clear that this proposed development meets with the criteria expected by Council for a development on this site. Note again that the 2GP requires only a coach loading space on site and assumes coaches will be parked off site.
18. Based on the above, I have concluded that this is an appropriate site for the proposed hotel development from a traffic and transportation engineering viewpoint.

Subsequent updates

19. Following lodgement of the resource consent application, further work was carried out to refine the proposal. Recently, an experienced international operator for the proposed hotel has been confirmed. The operator has seen the plans and have not expressed any concerns about the traffic and transport or parking arrangements.
20. Although coach parking has been shown on the plans to meet the requirements of the district plan, it is unlikely that it will be used. It is more likely that a coach driver will stay at a separate motel and will take the bus away for cleaning and storage elsewhere. It is also likely that most patrons will arrive in smaller coaches than a full sized coach. However, it is clear that there will be enough coach parking on site to meet the needs of the hotel patrons regardless of the type of vehicle they arrive in.

Response to submitters concerns

21. Submitters concerns regarding traffic and transport related issues can be summarised into the following groups:

- Traffic volumes on Moray Place
- Management of major events at the town hall (graduation, etc)
- Roundabout design
- Moray Place vehicle access
- Loss of public carparking on the off street carpark
- Loss of electric vehicle charging station
- Shading of footpaths leading to slippery footpaths

22. While these issues have been discussed previously, further specific comment is provided here.

Traffic volumes on Moray Place

23. Traffic volumes on Moray Place will not be significantly different to the current daily volumes. Most of the traffic associated with the hotel will be before 9am (check out) or after 4pm (check in). As discussed in the ITA, the existing carpark and some of the permitted activities could generate significantly more traffic than the hotel. Hence, the hotel will cause no additional congestion issues for Moray Place or Filleul Street and any specific traffic issues can be addressed by specific design.

Management of major events at the Town Hall

24. Major events such as graduation ceremonies will not be affected adversely by the proposed hotel. The carparking on the Filleul Street carpark is already well used and any event that started after about mid-morning would be unlikely to find parking available in the small public carpark. The lower traffic generated by the hotel will mean that the roads may be marginally less congested but the effect would not be noticeable.

25. One potential benefit is that some of the visitors for the ceremonies would be able to stay at the hotel and walk to the ceremony.

26. It should also be noted that the hotel will not be competing with the Town Hall for major conferences. The hotel only has small rooms for seminars or break out rooms. An important function of the hotel is to provide accommodation to support the Town Hall conference facilities. Hence, more major conferences may come to the Town Hall because of the 5 star hotel being adjacent but the very close accommodation will minimise the conferences effect on traffic except with an increase in pedestrians crossing Moray Place. This is another beneficial effect of the proposed hotel.

Roundabout design

27. The roundabout has been shown in concept at this stage. It will be further developed in the design stage to ensure that all appropriate traffic movements can be accommodated. It is unlikely that a full size coach and perhaps some servicing vehicles could turn left onto Filleul Street but that does not detract from the roundabout concept. Coaches and larger trucks leaving the site will still be able to access the roundabout and from there can access the public road network. This is an appropriate solution.
28. The roundabout will form an important part of the urban design of Moray Place. It will control traffic speeds and improve pedestrians' opportunities to cross Moray Place including at the Filleul Street intersection which is currently a difficult task. The proposed roundabout and Moray Place urban design form a significant benefit to the community.
29. The roundabout will perform well with the amount of traffic expected to use it.

Moray Place vehicle access

30. Access to the proposed hotel from Moray Place has been questioned. While the sight distance has the appearance of being restricted by the vertical curve on Moray Place, sight distance complies with the standards that are required. Road and Traffic Standard 6 "Guidelines for Visibility at Driveways" published by the NZ Land Transport Safety Authority suggests 40 metres visibility should be provided on a road

classified as a local road. Although RTS 6 does not have a correction for grade, a typical correction for other documents suggests that about 10 metres should be added to the sight distance to allow for the downhill gradient towards the site access. Hence a minimum of 50 metres visibility should be provided. In this case, there is a minimum of 76 metres of sight distance available. It is my opinion that this distance is sufficient for the site access to operate safely.

Loss of public parking on the off street carpark

31. It is acknowledged that there will be a loss of carparking due to the proposed hotel. Part of the leased carpark and all of the paid public carpark will be lost and some of the on street parking on Moray Place will be rearranged to accommodate the urban design upgrade of Moray Place. However, the Council has a clear policy in the District Plan to deal with carparking in the Central Area. This is policy 9.3.4 and is repeated below.
32. Policy 9.3.4 states

Policy 9.3.4
Avoid, remedy or mitigate the adverse effects of car parking for large scale retail or commercial residential activities within the Central Parking Area.

Explanation
 Public car parking is provided throughout the Central Parking Area for the benefit of the wider community. This is done:

 - (a) In recognition of the fact that many sites are unable to provide on-site parking.
 - (b) In order to ensure that incremental and piecemeal parking developments do not have the cumulative effect of reducing the safety and efficiency of the roading network.
 - (c) In order to protect the amenity of the inner City as a ‘people’ place. Therefore Council will not require the provision of car parking within the zone, except in the case of large scale retail and commercial residential activities. These developments have special car parking requirements in the form of relative extent and/or duration which cannot be reasonably met by public facilities.
33. Policy 9.3.4 clearly suggests that the Dunedin City Council will be responsible for provision of public carparking in the CBD. They will use their parking strategy to manage the supply and demand and do not want a lot of small private carpark areas associated with each development that can cause safety problems for pedestrians in particular

and is an inefficient use of land. The exception being large scale retail and commercial residential which must supply their own parking.

34. The proposed hotel has supplied car and coach parking on site as prescribed by the operative District Plan. The Council will consider the effect of the parking supply and demand for this site and all the others in the Central Area in their next review of the parking strategy.

Loss of electric vehicle charging station

35. Electric vehicle charging stations have only recently been installed in the carpark. The electric vehicle charging station network is new and developing throughout the country with many different ways of dealing with them. It is likely that they will become more common in public areas over time. For example, in Wellington City, chargers have been erected on public parking spaces on street.

Shading of footpaths leading to slippery footpaths

36. While shading of the footpaths can be a problem, there are many other areas around Dunedin with similar shading issues. It will be important to consider the footpath material carefully to ensure a product is used that will not become slippery in frosty weather.

Section 42A report

37. The Council has prepared their section 42A report. I have read this and concur with their findings on the traffic and transportation issues arising from this application.

Conclusion

38. It is my considered opinion that the proposed hotel development is an appropriate activity for this site. The activity itself is a permitted activity and is therefore within the scope of what the Council expected could be developed on the site. It meets the traffic and parking related criteria for a permitted activity. The Council has clearly accepted responsibility for providing public carparking in the Central Area as demonstrated in policy 9.3.4 of the operative District Plan and the 2GP Plan. The traffic effects of the proposed hotel are likely to be less than the existing carpark or

some of the other permitted activities. There are improvements proposed to the existing road network in the vicinity of the proposed hotel, in particular the roundabout at the Filleul Street/Moray Place intersection and improved urban design along the Moray Place frontage. Therefore, I conclude that the traffic and parking effects of the proposed hotel will be no more than minor.

A Facey

Date: 17/07/2017