



## Basin Bridge Proposal

<b>Proposal Name:</b>	Basin Bridge
<b>Applicant:</b>	New Zealand Transport Agency
<b>Notification Date:</b>	10 August 2013
<b>Submission Close:</b>	5:00pm, Friday 6 September 2013
<b>Further Information:</b>	<a href="http://www.epa.govt.nz/Resource-Management/Basin_Bridge">www.epa.govt.nz/Resource-Management/Basin_Bridge</a>

The NZTA has lodged an application under the Resource Management Act 1991 for one notice of requirement and five resource consents for the Basin Bridge project. The application is referred to as the Basin Bridge proposal (the proposal).

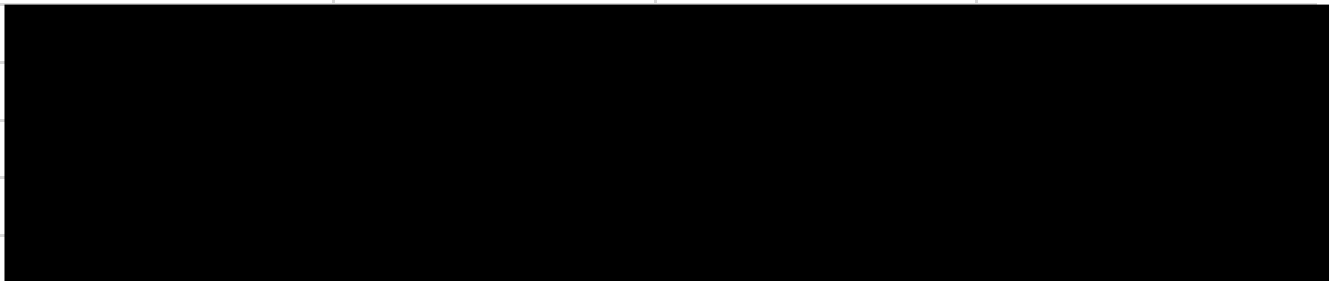
The proposal involves the construction, operation and maintenance of State Highway 1 in the vicinity of the Basin Reserve cricket ground, and within the Wellington City central area and the suburban areas of the Mount Victoria, Newtown and Mount Cook.

### Part A *This part provides the EPA with information about you as a submitter*

#### 1. Submitter details

*Please provide your name (or company name) and as much contact information as possible. We may need to contact you during or outside of normal business hours. Please advise us if any of your contact details change.*

<b>Name of organisation (if relevant):</b>	The Architectural Centre Incorporated		
<b>Title:</b>	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr <input type="checkbox"/> Other: <i>(Please tick the appropriate title)</i>		
<b>First name of submitter:</b>	Christine	<b>Surname of submitter:</b>	McCarthy



## 2. Alternative contact person details

You may choose a friend, relative, lawyer, professional advisor or any other person to be your point of contact. Please provide their contact details below.

<b>Relationship of contact person to submitter:</b> (e.g. legal counsel, professional advisor, other)	Architectural Centre committee member		
<b>Name of organisation (if relevant):</b>			
<b>Title:</b>	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr <input type="checkbox"/> Other: (Please tick the appropriate title)		
<b>First name of contact person:</b>	Dennis	<b>Surname of contact person:</b>	Chippindale



### Privacy statement

Your personal information included in Part A of this form, will be held by the EPA, 215 Lambton Quay, Wellington. All information held by the EPA is subject to the Official Information Act 1982. It will be used by the EPA for the administration of the Basin Bridge proposal Board of Inquiry process. Copies of your full submission will be provided to the Board of Inquiry and the applicant, and may also be provided to other parties in the process. Other than your name, your personal contact information will not be published on the EPA website. You have the right to access and correct personal information held by the EPA.

Your name, the information in Parts B and C of this form, and any attached information will be published on the EPA website, and made available to members of the Board of Inquiry, the applicants and the public for use in the processing and consideration of the Basin Bridge proposal.

## 3. Are you a trade competitor?

- We **are not** a person who could gain an advantage in trade competition through this submission.
- I am / we **are** a person who could gain an advantage in trade competition through this submission and I am / we are directly affected by an effect of the change that adversely affects the environment; and does not relate to trade competition or the effects of trade competition.

## 4. Authority to act

- I / We confirm that I / we have authority to sign this submission on behalf of all persons named on this form.

**Christine McCarthy**

**4 September  
2013**

**Signature**

**Date**

This submission is from the Architectural Centre, an Incorporated Society (no: 215928), and a Registered Charity (CC40665). We have been advocating for good design in the built environment since 1946. The Centre established the first architectural school in Wellington (1947), and the first town planning school in New Zealand (1949). Throughout our 67 years we have actively participated in submission processes regarding the built environment (including the development of the Wellington waterfront, changes to the District Plan, various Resource Consents, and the Ngauranga to Airport Strategic Study) with the aim of positively and productively contributing to the quality of our built environment. Our involvement with the Basin/Memorial Park precinct began in July 2007 with a Memorial Park seminar and design competition for a Memorial Park, which included briefings from the Ministry for Culture and Heritage, and the RNZRSA, and presentations about relevant landscape, archaeological, traffic engineering, and urban design issues. This involvement has continued with respect to the Basin project through discussions with the NZTA, WCC, NZHPT and numerous community groups.

## Part B *This part asks for your position on the proposal*

### 5. What is your position on the proposal?

*You can state your position on the proposal as a whole, or any part of it. If you have opinions on different aspects of the proposal then you can be specific about these in the space provided below.*

*If you require more space, please attach additional pages as necessary. Please ensure you include your name and the EPA proposal reference number 'NSP026' on each additional document.*

Position	Support in full	Support in part	Neutral	Oppose in part	Oppose in full	Range of Views
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Reason including any suggested conditions</b>	<p><b>1. The project if approved will fail to ensure the maintenance and enhancement of amenity values (RMA Part 2 7(c)), and the maintenance and enhancement of the quality of the environment (RMA Part 2 7 (f))</b></p> <p><b>2. The project if approved will have significant adverse amenity effects which can not be adequately avoided remedied or mitigated. These include adverse effects with respect to urban design, amenity and urban form.</b></p> <p><b>3. The proposal does not represent sustainable resource management and in particular fails to provide for the social and cultural wellbeing of people and communities in Wellington and in particular those near the proposed flyover.</b></p> <p><b>4. Particular aspects of concern in relation to amenity values and quality of the environment include the following:</b></p> <p>(a) the proposed structure will not be effectively and sympathetically incorporated into the existing neighbourhood context, nor will it maintain and enhance the physical character of Residential Areas (WCC District Plan, chapters 4 and 12).</p> <p>(b) the proposed structure will be intrusive and out of scale with the residential fabric of the suburban area. The Basin precinct (unlike urban Japan or inner-city New York) does not have a physical scale, density, and prevalence of other concrete structures to provide a cityscape capable of accommodating such large-scale and unappealing structure.</p> <p>(c) the proposed structure will negatively impact on the area in terms of visual effects.</p> <p>(d) the proposed structure will negatively impact on the area in terms of shading, noise, wind, visual impacts on local residents, community groups and users of the Basin Reserve.</p> <p>(e) the proposed structure will have a negative impact on streetscape, views, open space, community identity and place-making (including character and heritage).</p> <p>(f) the proposed structure will cause community severance.</p> <p>(g) the proposed structure will have negative impacts on the sense of place created by urban form and the surrounding landscape context, character and topography.</p> <p><b>5. The proposal will negatively impact on the quality and nature of future development in the Basin precinct. This development is anticipated in a number of planning strategies and policies, including the Wellington City Council's Urban Development Strategy 2006 and the Adelaide Road Framework 2008.</b></p> <p>The area of the proposed designation is envisaged to support medium density, mixed-use residential development. This increased residential density is important to support initiatives</p>					

such as the proposed Public Transport Spine. There are two principle ways in which this application will negatively impact on future development:

(a) residential intensification of the area in the future will increase the number of residents negatively affected by the visual, noise and wind effects of the elevated road. Occupants of new medium density housing in the proximity of the elevated road may experience more severe effects than existing residents in the area because of different height relationships to the proposed elevated road.

(b) The proposal will make the immediate surrounding areas less attractive to live in, leading to lower property values. Developers therefore won't be able to achieve a sufficient return on high quality residential developments, giving the area over to either lower quality residential or cheaper, big box-type development, and undermining council aims for increased residential density and a high quality public environment.

**6. The proposal is not reasonably necessary to achieve, the stated project objectives in the Notice of Requirement:**

- to improve the resilience efficiency and reliability of the State Highway network
- to support regional economic growth and productivity
- to support mobility and modal choices within Wellington City
- to facilitate improvements to the local road transport network in Wellington City in the vicinity of the Basin Reserve.

These objectives largely depend on reducing congestion. The application will not achieve a long term reduction in congestion in either the local or State Highway network because:

(a) it does not address current bottlenecks.

(b) of induced or generated traffic effects as a result of this and other RoNS projects.

**7. The economic assumptions of the broader RoNS, which provide the context for the application, are incomplete.**

(a) the building of the flyover, as part of the Wellington RoNS, is premised on economic cost benefit analysis projections which may be misleading due to insufficient anticipation of induced traffic.

**8. The proposal will have negative heritage impacts (RMA Part 2 6(f)).**

The negative impact on heritage values include:

(a) significant negative visual impact on the viewshaft from the Basin Reserve along Kent/Cambridge Terrace.

**9. The Requiring Authority has not adequately considered alternative sites routes or methods for undertaking upgrading works.**

(a) The evaluation of the Architectural Centre's Option X was inadequate, particularly with respect to the urban design assessment.

(b) NZTA has not given adequate consideration to the option of deferring a decision as to whether to proceed with option until after the Mt Victoria Tunnel upgrade has been completed.

**10. The Requiring Authority has not adequately considered the availability of other alternatives to address the objective of relieving congestion.**

(a) It appears that insufficient or no consideration has been given to congestion charging, Travel Demand Management, or exclusive investment in Public Transport to address congestion.

(b) There appears to have been no analysis of the sociological issues exacerbating congestion and corresponding solutions (e.g. school traffic, which has been identified in Auckland as causing one third of the traffic demand).

(c) There appears to have been no consideration of other technologies impacting of the transportation of goods (e.g. the role of digital transfer and the use of 3D printers, in the way that postal demand has significantly diminished with the invention and uptake of electronic mail, especially in the context of the roll out of ultra fast broadband (UFB)).

## 6. What decision would you like the Board to make?

Please indicate below what decision you would like the Board of Inquiry to make about this proposal and provide reasons. If you would like to see any changes to the proposal and/or make any suggestions for conditions if it were to be approved then you can include these.

If you require more space, please attach additional pages as necessary. Please ensure you include your name and the EPA proposal reference number 'NSP026' on each additional document.

- Grant
- Decline
- Grant with conditions (please describe the changes or conditions you would like below)
- No view
- Other (please describe the decision you would like below)

Provide reasons including any changes sought and/or suggested conditions.	<p><b>Reasons as above.</b></p> <p><b>Relief Sought:</b></p> <p>(a) that the relevant Resource Consent applications be declined.</p> <p>(b) that the Notice of Requirement not be confirmed.</p> <p>(c) that, if the Resource Consent applications are granted and Notice of Requirement is confirmed, we request they are subject to the condition that the project is rescheduled until after the completion of the Mt Victoria tunnel duplication and that a further review is undertaken at that stage to ascertain whether or not the project is required and to further review carried out of alternatives.</p>
---	---

## 7. What is your position on the planning matters

The applicant is seeking approvals under the Resource Management Act 1991 for one notice of requirement for a designation and five resource consents. These are referred to as the 'matters'.

### Notice of requirement and resource consent applied for under Wellington City Council jurisdiction

- **NSP 13/03.001:** Notice of requirement for the construction, operation and maintenance of State Highway 1 in Wellington City between Paterson Street and Buckle / Taranaki Street and to construct all associated mitigation works.
- **NSP 13/03.002:** Land use consent for sampling, disturbance and change of use of potentially contaminated soil where there is a potential risk to human health.

### Resource consents applied for under Wellington Regional Council jurisdiction

- **NSP 13/03.003:** Land use consent for the excavation of bore holes that may intercept groundwater associated with the construction of bridge piles and ground improvement works.
- **NSP 13/03.004:** Water permit for the taking and use of groundwater during excavation of bore holes associated with the construction of bridge piles.
- **NSP 13/03.005:** Discharge permit to discharge contaminants to groundwater associated with the construction of bridge piles and ground improvement works.
- **NSP 12/01.006:** Discharge permit to discharge potentially contaminated groundwater to land including via the reticulated stormwater system where it may enter water.

Set out the matter (listed above), your comments and any changes sought and/or suggested conditions.

The submitter primarily seeks that the Notice of Requirement not be confirmed and it follows that resource consents should be declined. Its primary focus is on landuse planning matters and accordingly its concerns will not be addressed by any changes to the conditions of any of the consents sought.

The submitter does not consider that changes to the conditions of the Notice of Requirement will be able to adequately address the adverse effects of the project referred to above.

The submitter seeks that the Notice not be confirmed. Whilst it has outlined alternative relief, it does not consider that such relief will adequately address the matters it has raised.

## Part C *This part provides the EPA with information to assist with administration of the hearing*

### 8. How would you like to receive correspondence?

- I / we wish to receive ~~paper~~ copies of documents where possible

### 9. Do you wish to speak at the hearing?

*As a submitter you may speak to your submission (and any evidence you may provide) at the hearing. To assist us with planning for the hearing, please advise us below if you are intending to speak.*

- I / We do ~~not~~ wish to speak about my / our submission

OR

- I / We **do** wish to speak about my / our submission

- If others make a similar submission, I / we will consider presenting a joint case with them at the hearing.

- I / We wish to present in Maori / Te Reo / New Zealand Sign Language.

## 10. Do you intend to provide expert witnesses?

*This section only relates to people who want to speak at the Board of Inquiry hearing.*

- No, I / we **do not have** expert witnesses
- No, I / we **do not have** no expert witnesses, but I consider I have expertise to be considered an expert (please fill in the table below)
- Yes, I / we **do have** expert witnesses (please fill out the table below).

*If you know the areas of expertise of your expert witnesses and their names then please provide these. This information is for provisional planning purposes only - final confirmation of expert witnesses will not occur until the evidence of the submitters is lodged with the Board.*

Name of witness	Area(s) of expertise	Phone number	Email address
	urban design		
	wind		
	planning		
	traffic		
	possibly noise		