

**Before a Board of Inquiry
Basin Bridge Proposal**

Under the Resource Management Act 1991 (the Act)

In the matter of a Board of Inquiry appointed under section 149J of the Act to consider the New Zealand Transport Agency's notice of requirement and five resource consent applications for the Basin Bridge Proposal.

**Witness Concise Summary of Elizabeth Janice McCredie
[Jan] for the Mt Victoria Residents Association**

21 April 2014

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1 I have participated in Expert Witness Conferencing on Urban Design / Architecture / Landscape Architecture / Visual during December 2013. Following this process I co-signed a Joint Witness Statement with other expert witnesses.

2 I have read and am familiar with the Code of Conduct for Expert Witnesses in the current Environment Court Practice Note (2011), have complied with it, and will follow the Code when presenting evidence to the Board.

3 I provide a concise summary of my evidence-in-chief and rebuttal evidence below.

SUMMARY OF EVIDENCE

4 My evidence concludes that the Basin Bridge Proposal has substantial negative impacts on Wellington and on the Basin Reserve Historic Area. The strong recommendation is that the Basin Bridge Proposal should be **declined**.

PLANNING CONTEXT

5 Wellington City is the only compact, walkable city in Australasia. Many cities worldwide aspire to achieve similar qualities.

6 It is a city that encourages you to live downtown [63% growth between the last two censuses]; walk to work; explore upstairs bars; attend university; and buy your weekly produce at the waterside markets. It gets power from renewable resources. It is innovative and creative. It is the Capital City of New Zealand.

7 The vision, goals and objectives for Wellington are contained in its planning, transport, economic and marketing documents. These include 'The Central City Framework - Wellington Towards 2040: Smart Capital' [based on Wellington Spatial Structure Plan 2040]; 'Wellington City Urban Development Strategy 2006' [UDS]; 'The Wellington Regional Land Use and Transport Strategy' [RLTS]; 'The Economic Development Strategy' [EDS]; 'Transport Strategy' (2006); 'Centres Policy' (2008); 'The Adelaide Road Framework' (2008); and 'The Wellington Regional Policy Statement' (RPS).

8 The vision in all these documents supports retaining and strengthening the attributes of the city 'we have' - by enhancing - urban amenity and sense of place;

a compact, walkable city; a city of innovation and creativity; of beauty and resilience; a safer and more liveable city; more sustainable, better connected and more prosperous; a city that is memorable and distinctive.

- 9 The objectives for the city are encapsulated in the 'Wellington City Urban Development Strategy' [UDS]: *"To ensure that future growth and change reinforce the physical and spatial characteristics that make Wellington so distinctive; focus on high quality urban design and development and contributes to the stimulating and intense urban experience Wellington offers"*.
- 10 The physical characteristics that create *"the stimulating and intense urban experience"* include the small street blocks; the legible street pattern derived from the Mein Smith 1840 City Plan; and the contiguous dense built form nestled under the Town Belt and edged by Wellington Harbour. Contained in the city's small footprint are the Parliament and Government House; the local civic functions; Massey and Victoria Universities; Te Papa; shops; offices; services; dwellings; sporting facilities; parks, the port and public transport.
- 11 My evidence contends that the Basin Bridge Proposal, including mitigation measures, is totally contrary to *"high quality urban design"* and *"stimulating and intense urban experience"*. The Proposal severely compromises what Wellington is and what it aspires to be in the future.

IMPACT OF THE BASIN BRIDGE PROPOSAL

- 12 Cities are formed by built environments overlaid on land over time. It is through the definition of buildings, streets and open spaces relative to the landform that people experience an urban area.
- 13 Buildings are organised along streets and around natural and man-made spaces so that they create and define the public space of the city. It is these public spaces that influence how people use and experience the city.
- 14 The street and open space pattern, combined with the density and diversity of land uses, are the major contributors to a city's identity; legibility; accessibility; walkability; amenity; resilience; and economic performance.

- 15 Many European cities that were designed and laid out in the 1800's had fine grain street patterns. This has enabled them to develop with a commensurate density of buildings and uses into strong, sustainable places. Barcelona, Paris and Berlin are good examples.
- 16 Wellington has both this street pattern and density. Its pattern and hierarchy of streets, combined with its open spaces, reveal the natural setting and reflect its history. The density of the buildings and the diversity of activities promote its urban lifestyle.
- 17 It is essential that all interventions into Wellington should enhance its 'memorable and distinctive places' and repair those areas of the city that have been weakened or destroyed.
- 18 The 'Wellington 2040 Spatial Structure Plan' [SSP, Sec 3] states that the spatial structure of Wellington has become less clear ... "*much of this is the result of the prioritisation of traffic over pedestrians.*" For "*loss of visual and physical amenity*" the SSP recommends "*clarification over alteration*". Similar to Jan Gehl's analysis [2004], the SSP supports the concept of integrated traffic and people movement.
- 19 The Basin Bridge Proposal is a significant intervention in the city which fundamentally and detrimentally alters the street and open space pattern of Wellington.
- 20 The Basin Bridge Proposal [the Proposal] spatially severs the city by introducing a flyover into a critical historic and civic spatial junction at the Basin Reserve. The southern areas of the city (including Government House, the National War Memorial, the Basin Reserve, Newtown and Mount Cook) are separated from the city's northern areas (including the CBD and Mt Victoria).
- 21 The Proposal destroys the connection and continuity between Adelaide Road and Kent and Cambridge Terrace through the Basin Reserve. This is the only north-south valley which links the city from Wellington Harbour to Cook Strait.
- 22 The Proposal removes the legible role of the Basin Reserve Roundabout as the only roundabout of its type in New Zealand and a key organising element of movement in the city. The roundabout is an integrating space; the flyover is a segregating object.

- 23 The Proposal removes the potential to reinforce the spatial definition of the outer edge of the Basin Reserve by Buckle and Ellice Streets, Dufferin, Rugby and Sussex Streets (all these historically formed Sussex Square).
- 24 The Proposal removes the potential to reinforce the spatial definition of the inner edge of the Basin Reserve Roundabout.
- 25 The Proposal destroys the internal arrangement of the Basin Reserve Cricket Ground by:
- a) locating the Northern Gateway Building [NGB] across the north/south open space axis of the ground contrary to the current 'built' west edge and landscaped 'east edge' division;
 - b) providing a screen between the NGB and the Players Pavilion thereby creating a continuous wall contrary to the current relationship of individual buildings separated by space
- 26 The Proposal creates two open space areas that have no spatial definition or specific use. These are:
- a) The termination of the flyover and pedestrian path in the north-east quadrant of the roundabout;
 - b) The termination of the flyover with the extension of Memorial Park in the north-west quadrant of the roundabout.
- 27 These 'left-over' areas [approximately two small city blocks] are potentially unsafe and act as an impediment to pedestrian movement in all directions. The possibility of these spaces becoming undesirable places in this location is high due to the low height of the flyover; the large amount of undefined space; and the absence of surveillance.
- 28 The Proposal creates an irregular and incoherent open space between the NGB and the flyover. This 'plaza' space creates a poor entrance to the Basin Reserve due to the proximity of the NGB to the flyover, as well as their different plan shapes, profiles, column designs and materials, all of which is compounded by inappropriate planting.

- 29 The Proposal compromises the Basin Reserve as a cricket venue because the continuous movement of vehicles on the flyover will be visible from many parts of the venue.
- 30 The Proposal degrades the importance of the National War Memorial. This is partly through its spatial disconnection; and partly by reducing the dominance and visual impact of the Carillon by severing the sight lines from Kent and Cambridge Terrace, and by reducing the height differential between the lower ground and the knoll on which the Carillon sits.
- 31 The Proposal removes the potential to highlight the entrance to/from Government House. The view from the gates of Government House is directly into the north-east quadrant of the roundabout where the flyover and pedestrian/cycle bridge meet the ground at different angles, alignments and construction. This view will not be blocked by planting. Planting may modify the view but by definition planting in a motorway environment is always compromised so as not to impede travel sight lines.
- 32 Conversely, if the Basin Reserve Roundabout can be defined by a strong outside built edge [the historic Sussex Square] the lower scale entry gates to Government House will read as a contrasting open space element.
- 33 The Proposal destroys the exceptional and unique entrance to the city from the Mount Victoria Tunnel where the view over the city provides a stunning and a legible reading of the central city: *“Then out of the tunnel and Wellington burst like a bomb. It opened like a flower”*(Wellington Towards 2040: Smart Capital). The flyover shifts the view off the city axis and the view is blocked / diverted by the flyover’s alignment and height of balustrade.
- 34 The Proposal reduces the development capacity of this fast growing area of Wellington. This is the result of the loss of development sites directly affected by the flyover and the loss of amenity on the wider precinct of South Te Aro where potential development sites are alienated by noise, lighting and visual impact. The loss of development here exacerbates the severance of the city and has a negative economic impact.
- 35 Some of the land around the Basin Reserve Roundabout is currently degraded. This current state belies the quality of the historic area and the potential to repair it. I believe if Kent and Cambridge Terrace and the streets around the roundabout

were built at their planned scale, alignment and mix of use, the introduction of a flyover would be unlikely to be considered.

- 36 The project destroys two main viewshafts, Kent/Cambridge Terrace and Buckle/Ellice Street. Viewshafts reveal the landform and are fundamental to the way people understand and negotiate urban areas. Viewshafts have the capacity to highlight and give value to important places and buildings. When views to places of importance are lost the value of those important places is downgraded. In this case the Proposal compromises or destroys views along these streets, into the Basin Reserve and up to the Town Belt.
- 37 Kent and Cambridge Terrace are unique historically and physically. They link Wellington Harbour to the Basin Reserve. The New World supermarket that terminates the view to the Harbour at the northern end is generally recognised as having a detrimental impact on the view. Future redevelopment of the site however could rectify the situation. At the southern end the view to the Basin Reserve and the Town Belt beyond will be blocked by the flyover, NGB and infill planting. This is equally detrimental and ultimately far more difficult to rectify.
- 38 The project blocks the view shaft along Buckle/Ellice Street to the Town Belt from the top of Kent and Cambridge Terrace and from the new plaza in front of the National War Memorial. Buckle/Ellice Street is the southern-most view shaft of the three east-west view shafts across Kent and Cambridge Terrace.
- 39 The Basin Bridge Proposal has negative impacts on many properties in the adjacent precincts particularly those around the north-east corner of the Basin Reserve and on the higher slopes of Mount Victoria. These will all suffer loss of views, noise, the impact from lighting and reduction of property values. The Proposal physically passes over the Regional Wines and Spirits site in Ellice Street negating its street presence, destroying its street address and limiting any capacity for development. The adverse effects are similar on St. Josephs Church.

SUMMARY OF REBUTTAL EVIDENCE

- 40 Mr Ulusele in his evidence-in-chief for Wellington City Council [17 December 2013] clearly outlines many of the strategic objectives for the city contained in a range of Wellington City Council documents. His overall assessment at Points 84-93 of his evidence maintains that “*the Basin Bridge project meets the transport*

related objectives”, however there is no assessment as to how the Proposal supports the desired urban outcomes for Wellington City.

41 Mr Swainson in his evidence-in-chief for Wellington City Council [17 December 2013] states in Point 74 that *“there is not total alignment of the Basin Bridge project with all the objectives included in its [WCC] key strategic transport documents. However it is in my [Mr Swainson’s] view the best option available to meet the city’s key transport objectives”*.

42 In my opinion, the Proposal does not meet the key transport objective of ‘integration’ or of facilitating pedestrian movement. Integrated traffic management balances the impact of ‘vehicle space’ with that of ‘people space’, facilitates access for trade and provides pedestrians with a contiguous street frontage devoid of blocking elements such as the space under the flyover. The Basin Bridge Proposal may manage traffic but at the expense of pedestrian movement and an integrated city.

43 Mr McIndoe’s evidence-in-chief for Wellington City Council and the Basin Reserve Trust [17 December 2013] focuses on the detailed aspects of the Proposal and does not address many of the key urban design issues. These include the loss of spatial continuity from Wellington Harbour to Cook Strait along the city’s major north-south axis; the segregation of both Government House and the National War Memorial on the ‘south’ side of the flyover; and the dominance of the Proposal relative to the size, form and grain of the city.

44 Mr McIndoe’s evidence-in-chief does not address the adverse impacts of the Proposal on: the impact on the Basin Reserve in terms of its history, culture and social importance as the only heritage-listed cricket ground in New Zealand; the loss of the Basin Reserve Roundabout as a key organising element for movement in the city; the compromise of the dramatic entry into Wellington from the airport through the Mount Victoria Tunnel; the absence of any assessment of the project in relation to the economic impact on Wellington City; and the negative impacts on Wellington as a compact, walkable city.

45 Mr McIndoe’s evidence-in-chief also fails to consider International Best Practice; and to properly assess an ‘at-grade solution’ [particularly in light of the Urban Design Expert Witness Conferencing Statement in which there was unanimous agreement that an at-grade solution would, in principle, be less invasive.

- 46 Mr McIndoe's evidence-in-chief identifies the Samuel Beckett Bridge, the Webb Bridge, the Millau Viaduct and the Kylesku Bridge; Lords Cricket Ground and the MCC; as having relevance for the Basin Bridge Proposal. The totally different contexts and scales of all these projects invalidate them as appropriate precedents.
- 47 Mr McIndoe's contention in his Point 57 that the proposal removes traffic from the boundary of the Basin Reserve Roundabout is incorrect. It relocates traffic travelling west around the southern side of the roundabout onto the flyover at a higher level along the northern side of the Roundabout. The visual impact of the traffic is increased and pedestrian movement is impaired both underneath and on the flyover.
- 48 Mr McIndoe states in Point 67.7 - 67.8 that the outcome is "*a landscape oriented towards vehicles*" and that "*the negative impact of the flyover on the north-eastern quarter of the urban context is significant*". I agree. I consider, however, that it is not possible to adequately mitigate these significant impacts.

INTERNATIONAL BEST PRACTICE

- 49 The Basin Bridge Proposal is contrary to best practice. Internationally, grade separated road interventions within cities are being removed and replaced with traditional 'at-grade streets' that facilitate vehicles, people and commerce. The Shared Space Movement was started in Holland by the engineer Hans Monderman. It is now used successfully in Germany, Sweden and the UK.
- 50 The benefits of this more 'balanced' approach to people and movement in cities was raised in "The Health Impact Assessment" (HIA) of the Draft Wellington RLTS and is supported by the Space Syntax modelling for Wellington.
- 51 The Space Syntax modelling programme evaluates physical movement against economic performance. The preliminary study for Wellington 2040 highlighted that by not removing vehicles and people from the system and by promoting integration and "stoppingness" [a Space Syntax term], there would be improved economic and social benefits for the city. The reverse also applies. By removing vehicles and people from the system, as the flyover does, there will most likely be economic penalties for the city.

52 Despite the size and cost of the Proposal there has been no evaluation of the impact of the flyover on the economic performance of the city as a place of trade and commerce and no physical model produced that enables proper scrutiny.

53 The proposed grade separation at the Basin Reserve reflects its 1960's genesis. It is now outdated.

THE BASIN RESERVE ROUNDABOUT ENHANCEMENT OPTION [BRREO]

54 All experts who attended the Expert Witness Conference for Urban Design / Architecture / Landscape Architecture / Visual [12 December 2013] agreed "*that a functional at-grade option generally within the existing street corridors would, in principle, be less invasive.*" [para 57 (2)]

55 I signed a qualifying statement to this paragraph which did not support the words "in principle" and expressed the opinion "*that there is no question that an at-grade solution is preferable.*" I continue to believe this.

56 I have reviewed an alternative proposal for the Project prepared by Richard Reid & Associates, the Basin Reserve Roundabout Enhancement Option (BRREO).

57 This alternative proposal better manages the traffic at-grade using the Basin Reserve Roundabout as the organising spatial element. It retains and reinforces Kent and Cambridge Terrace, the historic Sussex Square and Adelaide Road. It retains and reinforces all viewshafts and the visual dominance of the National War Memorial. The extension of Memorial Park meets Cambridge Terrace with a direct clear interface and the bus drop off at St Marks School is reorganised to assist the school and improve the visibility of the Government House entrance. It enables all sites to be developed so that the urban fabric is repaired with a seamless joining of the north to the south of the city. There are no requirements for mitigating measures.

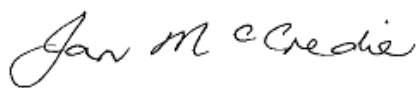
58 The proposal is a very elegant solution. It looks deceptively simple as do many good city plans e.g. the Mein Smith 1840 City Plan; and the 1829 Cerda Plan of Barcelona. BRREO enhances the great "bones" of Wellington to take it into the future.

59 There may be other 'at-grade' solutions but the BRREO proposal meets all the desired urban outcomes for Wellington.

CONCLUSION

- 60 Wellington City has many of the most desired characteristics in today's cities. The introduction of a grade separated flyover at the historic and topographically sensitive Basin Reserve will be extremely detrimental to the historic area and the city socially, culturally and economically.
- 61 The Basin Bridge Proposal does not support the city vision in 'Wellington Towards 2040: Smart Capital' and the 'Wellington City Urban Development Strategy'. It destroys rather than enhances one of the most '*distinctive and memorable*' places in Wellington. It adversely impacts on the Basin Reserve as a roundabout and as an international cricket ground. It destroys the role of Kent and Cambridge Terrace, Sussex Square and Adelaide Road forming the main north-south spine. It diminishes the dominance of the National War Memorial and Government House. It changes the image of Wellington as a compact walkable city in a fundamental way.
- 62 The management of people and vehicles at the Basin Reserve Roundabout should respect and enhance the values of the city. Those values are reflected in all the planning and transport, economic and marketing documents. They support a compact walkable city. A city that is safe and liveable, prosperous, connected and sustainable. The Basin Bridge Proposal does not achieve any of these aspirations.
- 63 This highly significant area of Wellington and the Nation should not be subjected to such an inappropriate proposal. The traffic benefits appear slender at best but the adverse impacts on the place and people are significant. The important civic, cultural and social places of the Capital City of New Zealand should be enhanced by all new interventions and should reinforce "*the stimulating and intense urban experience*" that is Wellington.

Signed



Elizabeth Janice McCredie