

Wellington Civic Trust

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Basin Bridge Board of Inquiry

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REPRESENTATION

1. This builds on our submission of September 2013 [#103448]. There has been very little since then, or from these hearings, to cause us to change what we said then. We have called Michael Mellor as an expert witness [submitter evidence in Vol for T-Z].

2. The Wellington Civic Trust is an incorporated society founded in 1981 with objectives including:

- To stimulate public interest in and care for the beauty, history and character of the City of Wellington and its surroundings and adjacent countryside and coastline and its dignity as the Capital City;
- To preserve, develop and improve buildings and features of general public amenity or historic interest or beauty;
- To promote high standards in architecture, landscape management, building and town and country planning.

This we do through formal processes like these Hearings, and by holding public forums designed to raise informed public interest. Particularly relevant now was our 2009 Seminar *Round About the Basin*, in which NZTA took part and whose *Proceedings* book remains a useful reference source. The Civic Trust's interest is quality of planning, the quality of Wellington's urban realm. Part of that is the movement of people, freight and traffic into, through and around Wellington. This includes an interest in what these roads look like from the outside, and how they add to the design quality of the capital city.

3. N2A – the *2008 Ngauranga-to-Airport Corridor Strategy* [Bundle of Documents vol 0 tab 8] - remains a reasonable basis for improving the movement of people and freight between the airport and the north. With political changes since 2008, RoNS lifts out bits of SH1 to get consents for them separately through this Board of Inquiry process. On 10 February Mr James of NZTA said in cross-examination [Transcript p452 line 10] that the project fits both the GPS at the time N2A was adopted and the current GPS introduced after the change of government in Nov 2008. Both the airport and the Mt

Victoria tunnel have been there for 80 years; the implications of April 2015 for any roading agency involved with Buckle St have been obvious for 90 years; and the north has always been where it is. So there has been plenty of time for considered analysis to generate a wealth of solutions. Indeed Mr Blackmore [10 February opening statement #1.20 (e)] has told the Board of NZTA's "blue sky thinking" and vast range of options.

4. Criteria of "affordability" are mentioned in the Joint Witness Statement from the Transportation expert conferencing on 5 February 2014. This implies that there is a cost limit over which any option becomes "not affordable". The inference is that this cost limit is set by the cost of the proposed one-way bridge. Is this not a self-fulfilling prophecy? As adjacent experience with the War Memorial Park undergrounding shows, what is "unaffordable" one month can become "affordable" the next – indeed, can suddenly become "the only sensible option".

5. Our view is that the project fails in respect of each of the following factors which the Board has to consider. These are

- i. The Minister's reasons for referring the proposal to the Board at all
- ii. The project objectives; and
- iii. Strategic fit.

As the Judge said at the opening of these hearings: are the works reasonably necessary to achieve the objectives? And has there been a major consideration of alternatives?

6. Firstly, the Minister's reasons [3 July 2013] –

- 6.1. "The proposal is ...in the vicinity of other historic placeslikely to...affect values ... which contribute to New Zealand's national identity." If the bridge were really useful, it might offset those impacts. But at best the proposed bridge is only half useful in improving SH1 traffic flows.
- 6.2. "The proposal is likely to result in significant and irreversible changes to the urban environment around the Basin Reserve." Transport policies and technologies will keep changing over time, but a heavy engineering project of this sort will, if consented, become a permanent memorial of mid-2013 thinking.
- 6.3. "The proposal has aroused widespread public interest." These interests go beyond mere SH1 efficiency. This Board is the only place where these public interests can influence the consents decision.
- 6.4. The proposal's benefits will help the Crown meet its other functions. The data being used as justification is being widely questioned.

7. Secondly, the project's own objectives [ref NZTA Folders Vol 1 p.3]. These are at best only partially met:

- A1 there is little relief from congestion for eastbound traffic between Paterson and Tory Streets – and that's the project scope defined in its objectives.
- A2 arguably does not improve the safety for cyclists and pedestrians travelling south and east between Paterson and Tory Streets
- A3 capacity is increased only marginally by eliminating some car parking, used now by vehicles which will have to find somewhere else nearby to park.

- B1 does not materially enhance movement of people and freight along eastbound SH1 through Wellington City
- B2 does very little to improve access to the airport
- C mobility and modal choices are rather fuzzy buzzwords. SH1 still crosses the PTSS and other public transport corridors at grade.
- C1 provides some opportunities for improved public transport, cycling and walking.
- C2 constrains opportunities for future transport developments in Te Aro and Cuba St.
- D yes, it allows some improvements to local roads in the Basin area.

8 Thirdly, strategic fit:

8.1. The Strategic Objectives of the Wellington Northern Corridor RoNS show at p.3 of the EPA Notice of Requirement form [vol 1 of the NZTA documents]. They are:

- to enhance inter-regional and national economic growth and productivity, by supporting a growing population and increasing freight volumes in the region;
- to improve access to Wellington’s central business district, key industrial and employment centres, port, airport and hospital;
- to provide relief from severe congestion on the State highway and local road networks;
- to improve the journey time reliability of travel on the section of SH1 between Levin and Wellington Airport; and
- to improve the safety of travel on State highways.

As with the Project Objectives, the proposal does little more than meet these half-way.

8.2. The City Council’s *Economic Growth Agenda to transform Wellington City* was released the week before these hearings began. One key goal is more international connections for people and freight at the airport. You will be hearing from Mr Brown of WIAL who notes in his submission [s.21 Evidence vol 4] that the ultimate form of this route needs to be 4 lanes (2 each way). Right now there are 4 lanes (2 in each direction) between Paterson and Tory Streets – i.e. through the area defined in the project objectives - so presumably what he means is a 4-lane road like Cobham Drive. The proposal ignores this in favour of NZTA’s “far-sighted, long-term, multi-modal transportation solution” [Mr. Cameron 4 February transcript p.124 line 23] of split corridors for SH1. The scheme seeking consent is not just phase 1 of something better: as Dr. Stewart said under cross-examination on 27 February [transcript p.2098 line 1] “there’s no aspiration in the planning horizon to contemplate all that” – i.e. meaning 2-way SH1 under WMP and through the ICB. No, this is it – this is the actual “far-sighted, long-term, multi-modal transportation solution” for this part of N2A, arrived at after intense blue-sky thinking and all.

8.3. The City Council’s *Smart Capital 2040* strategy is in the Bundle of Documents Folder P tab 17. Vivian St and Kent Tce feature in the central area where increased residential population and foot traffic are envisaged. A proposal which requires growing SH 1 traffic to cut through this central area by ordinary at-grade crossings is not a strategic fit. The future use of Vivian St as a local road was briefly mentioned by Dr. Stewart under cross-examination on 27 February [transcript p.2097 line 5] and has briefly flitted into these hearings at other times. But the proposal before the Board gives no reason why the Inner City Bypass should not be used in both directions to achieve the

purpose of RoNS, and does not give this as an option for resolving the stated Basin Reserve problems. The letter to the City Council of 7 August 2013 [tabled as Submitter Evidence vol. 4 and also in the folder Documents/Evidence presented day 23 11 March – towards the end of that folder] records that NZTA plans to reduce the ICB designation area because the Vivian St. clearways in the proposal will meet future requirements of SH 1 to 2031 here. Indeed the new kerbing work under way as we speak to reduce the width of SH1 where Karo Drive crosses Taranaki and Cuba Streets may well mean that this has already been formalized – the Board of Inquiry will know what the status is. NZTA notes that its study will be helpful on the future long-term needs of Vivian St. and is expected to conclude in early 2015. This means that the study on the long-term needs of Vivian St will be finished after work on the one-way bridge has begun but before it is in use, and after the designation of ICB corridor for SH 1 has been reduced. This seems back-to-front - the opposite of good “strategic fit”.

9. In each of these ways this proposal is seriously deficient. Any good points are well outweighed by the bad. Now I will summarise 4 particular issues:

10. **Vivian St.:**

10.1. This part of the proposal was described by Ms Wraight on 3rd February [Transcript p.7 line 11] as "minor alignment" work. In contrast Mr. James said on 10th February [Transcript p.471 line 33] “If we seek to provide an arterial function through to the airport it makes sense to put that on one route and define what that route is”. The proposal seeking consent in fact requires 2 routes for SH1 between Paterson and Tory Sts. Vivian St. changes are described as permitted now, so that no consent is necessary. Well, so is the whole existing road system near the Basin. It is within current permissions that probably traffic flow along Vivian St and Kent Tce could treble what it is now by reducing more parking, closing off side streets and so on. But the carrying capacity of Vivian St is not the issue here – the Civic Trust concern is the effect that this carrying capacity has on those who live and work nearby to it. Remember that Te Aro is a population growth area; and that NZTA will no doubt be seeking approval for still longer and heavier road freight trucks along SH 1. The proposal gives an outcome which, although "permitted", would degrade the surrounding area and cause more conflict with the at-grade crossings of public transport corridors at Willis, Victoria, Taranaki, Cambridge and Kent. This outcome is a predictable consequence of the design of this proposal seeking the Board’s consent for a one-way Basin flyover.

10.2. The Joint Witness Statement of the traffic expert conferencing on 5 February 2014, s.12 *Assessment of Pirie/Kent/Cambridge/Vivian intersection* notes that the intersection is close to capacity in the evening peak, with little spare for further growth beyond 2021. It recommends more investigation to ensure that sufficient capacity is available to accommodate traffic growth beyond then. Our comments on this are:

- i. That’s no problem for a roading engineer – just knock down the Greek Memorial, smooth out the corner and widen the road
- ii. 2021 is just over 5 years away. It’s only 5 years since the RoNS status of this road was promulgated in the first place.
- iii. Why have all that SH1 traffic coming down Vivian St anyway if it’s a true RoNS?

10.3. The Burrell report of 1980 and the decision 20 years ago - which is only alluded to vaguely in the proposal at p.6 of Vol 2: AEE - to not have airport-bound traffic use the Inner City Bypass, seem to be taken as tablets of stone. Surely, given RoNS as hi-level transport policy, this should at least be questioned unless it is convincingly shown to still be valid for 2014. NZTA [email of 8/9/12 in Submitter Evidence Folder 2 tab 15] sees no problem in using the ICB for west-bound traffic. The proposal does not present this as one of the options now for resolving the stated Basin Reserve problems. Those “environmental and urban effects” of 20 years ago are inferred from the proposal to still be greater than those caused by greatly increased SH 1 traffic along Vivian St and Kent Tce in the 21st century. The cross-examination of Dr. Stewart by Mr. Milne on 21 February revealed that as late as 2008, 2-way grade separation was the recommended solution. The silence anywhere in all the current project’s documentation about this option is surely “the dog that didn’t bark” until it is forced out under cross-examination, e.g. from Dr. Stewart on 27 February [Transcript p.2097 line 5]. The inference is that if 2-way grade separation or by-passing Vivian St. had been raised in even the bluest of blue-sky thinking, it was quickly deemed to not fit the party line and was airbrushed out of any record.

10.4. If the Board of Inquiry consents to the proposal, Wellington is faced with the prospect of a repeat performance when it is realized that Vivian St and Kent Tce are not appropriate for use as a RoNS and that another arrangement is in fact needed for the Basin Reserve. If this situation is envisaged at all, then it should be part of the present consents process. The Board can test whether Vivian St meets those RoNS objectives better (efficiency, cost, effectiveness, national benefit, quality, safety, etc) than the shorter route around the edge of the central area along a corridor already set aside over many years for SH 1 purposes and in fact already half-used for that purpose.

- 10.5. So our recommendations at B.6.7. of our submission remain: that NZTA
- (i) Explain convincingly why alternatives to using Vivian St and Kent Tce for the RoNS were not included in the proposal
 - (ii) Complete its “Terrace Tunnel investigation project” before it applies to alter and thereby reduce the designation area for SH1 along the Karo Drive etc. alignment.
 - (iii) Compare the “environmental and urban effects” identified from the c.1995 plans with those in the 2013 proposal; and from this to provide a convincing case for making Vivian St and Kent Tce. into permanent roads of national significance.
 - (iv) Not make any decision on the proposal until the effects of the second tunnel are fully considered.

11. The South-east Corner – Kent Tce / Ellice St / Dufferin St.

11.1. The “sunbathing” picture at Sheet 1B.04 in NZTA documents Section 1 “Project Overview” Tab B “Rendered views” in Plan Sets v.1 of 2 [the long folders] is best compared with the drive-through video simulation seen on February 3rd to show the actual gloom and complexity of this corner, which is the very point where the merge of SH1 and the PTSS is most congested. It is now also to be a BRT junction, and with a light-controlled crossing just around the corner. To cap all this off, it's the main approach

to Government House. This is the view that visitors to Government House will have on the main processional route between Parliament and the Head of State's residence – two main centres of Wellington as the Capital City of 100% pure New Zealand. Sheet 6B.01 of Section 6 "Structures" Tab B "Bridge architectural plans" in the NZTA documents "Plan Sets" vol 1 of 2 [the long folders] shows the compression of activities at this place.

11.2. Mr Cameron attempted to brush this off on 4 February with [Transcript p.147 line 39] "There is a longer-term vision here, and that is to create an enhancement of this area generally... then you have got the connections with Government House [p.146 line 9] you've also got the processional issue and how that might play out over time."

11.3. Well no, not playing out over time, but a day 1 fact. So it's a deficient solution and quite apart from its traffic function, we will all have to look at the bulk of this thing for decades to come. Meanwhile just 2 blocks away there is a real schemozzle at the Pirie/Vivian corner as the other half of SH1 competes with the PTSS for road space. It's real Emperor's New Clothes stuff.

12. Scale

12.1. The design approach for the bridge itself seems, from documentation at the WCC web page referenced in our submission under #B.6.4, to be that of an "elegant" bridge rather than an "iconic" one. There is a real risk of an "elegant" bridge quickly becoming festooned with underhanging signs, overhead signal gantries, banners draped over the handrails and the normal grime and staining which a concrete bridge incurs. For example, just a km or 2 north there's quite an attractive bridge for Hobson St over SH1 – now marred by steel frames and signals stuck right next to it.

12.2. The proposed Basin Bridge is highly visible, and consent should require much more than just its effectiveness as a traffic conveyor.

12.3. Mr. Hardwick-Smith on 3 February [transcript p.23 line 1] described the side of the cycle and walking track as being "stainless steel frame mesh". This sounds quite good until you check Sheet 6B.04 of Section 6 "Structures" Tab B "Bridge architectural plans" in NZTA Documents "Plan Sets" v.1 of 2 [the long folders]. In other words, it's wire netting, on the highly-visible north-facing aspect of the whole bridge.

12. Some details

13.1. The Richard Reid rebuttal evidence of 10 February p.13 #7.5 notes the varying widths of current SH1 lanes in the Basin area. Parking is to be removed at peak times on Vivian St. between Tory St and Cambridge Tce - but not to widen those lanes to the standard for a Principal/Arterial Road. Instead the purpose is to fit another lane into the already narrow carriageway. Both existing and proposed lanes in this section of Vivian St are less than 3.5m wide; to NZTA this is acceptable until at least 2031 for this vital RoNS.

13.3. Cycle and pedestrian provision is questioned in #B.7.5. of our submission, as here again NZTA's view of its own standards seems to be "do as I say not do as I do". Some of the cricket building details now seem a bit clearer but there must have been ample time for NZTA to sort out what it calls "final details" before lodging the application.

14. Summary

14.1. The NZTA solution is rather obsessively a 1-way bridge and they seem fixated on this. Data offered in its support is rather like that old Punch cartoon of a drunken man leaning against a lamppost – using data for support rather than for illumination.

14.2. In his opening statement [Transcript p.129 line 45] Mr. Cameron declared that "the amount of induced traffic as a result of the project is expected to be low, these benefits are not diluted by an increase in traffic demand." Well, there's another unique feature: this must be the first big road upgrade anywhere which hasn't generated much induced traffic. From the strategic fit of the map and the increased traffic generated by Airport growth alone, induced traffic growth is highly predictable.

14.3. It's already unique in one way – and I don't mean here that it's the only RoNS to run right through a red-light district. It's unique because this bridge proposal makes it the only RoNS to run right through a central city area on ordinary traffic light-controlled streets rather than bypassing the central city.

14.4. As Mr Cameron emphasised on the first day, decisions on the choice of routes and structures are an NZTA executive decision, not something for this Board or for any other party. NZTA really does seem locked into, obsessed even, about the 1-way bridge as the only possible solution to something studied by every road agency for the last 50 years.

14.5. The Civic Trust interest is a prosperous Wellington with effective transport and a quality of urban design which attracts people to live and work here. The design features in the proposal risk decay after the initial novelty has worn off, and we are left with an in-your-face concrete structure becoming just another road bridge. The big concern is that it doesn't actually do a useful job of separating SH1 from local traffic and from public transport; it requires mingling of PTSS and SH1 traffic; and it destroys both the Boulevard of Kent/Cambridge and the ability of Vivian St to actually be what it was built as over a century ago – an inner-city street of use to a growing inner-city population. These are all predictable and known effects of the Basin Bridge for which this Board is being asked to grant consents. There will be many good ways of implementing the N2A strategy through this area but, under current law, these are not a matter for this Board. Hence our comments relate solely to the specific works in NZTA's application, in the knowledge that these hearings are the only legal forum in which imaginative alternatives for making N2A a reality can even be mentioned.

14.6. The Bridge seeking consent has the predictable effect of gumming up Vivian St and Kent Terrace. It trivializes the whole policy concept of the Roads of National Significance. This isn't a far-sighted, long-term, multi-modal transportation solution; it's a half-pie lash-up.

A handwritten signature in blue ink, appearing to read 'Alan Smith', with a long horizontal line extending to the right.

Alan Smith

Chairman

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