

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.

Comments from Richard Leonard Cheyne Reid for the Mt Victoria Residents Association and Richard Reid & Associates Ltd on the Home of Compassion Crèche, Basin Reserve Historic Area, Wellington

03 July 2014

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1 Introduction

I make the following comments on the Ministry for Culture and Heritage's letter notifying the Board it has received the necessary resource consents for relocation of the Home of Compassion Crèche, based upon:

- my professional training as a registered architect and landscape architect and professional experience with urban design and transport infrastructure projects
- my professional experience with the relocation and return of a heritage building of similar status as part of another NZTA transport project of national significance (the Birdcage Hotel as part of the SH1 Victoria Park Tunnel Project in Auckland)
- my participation as an expert witness in the Basin Bridge Board of Inquiry

2 Is the relocation of the crèche necessary and reasonable as part of the National War Memorial Park (Pukeahu) Empowering Act 2012?

2.1 The relocation of the crèche was included as part of the works outlined in the National War Memorial Park (Pukeahu) Empowering Act 2012. To my knowledge it was included without public consultation or demonstration that it was needed to be relocated to enable the works.

In my opinion, the crèche is not required to be moved:

- i) to enable the works
- ii) to assist in the traffic performance after the works
- iii) to mitigate any adverse effects from construction of the underpass
- iv) to contribute to a positive heritage outcome for the building
- v) to enable a positive landscape and heritage setting to be created for the building
- vi) to enable a positive and integrated landscape outcome for the park

In other words, movement of the crèche is not:

- vii) required for resource management purposes
- viii) related to the authorised development
- ix) reasonable

2.2 I believe the decision to relocate the crèche as part of the National War Memorial Park (Pukeahu) Empowering Act 2012 was based upon prejudicial and premature advice given that an application for the Basin Bridge Proposal had not been submitted, tested by expert evidence, or approved.

I believe the decision to relocate the crèche was made:

- i) to enable a future controversial proposal to be more readily approved by removing a key obstacle in its way
- ii) help mitigate the Basin Bridge Proposal by blocking views of the flyover from the War Memorial Park commemoration area

2.3 In my opinion, and as outlined in evidence, the relocated crèche will:

- i) block views from Cambridge Terrace up to the War Memorial Park and vice-versa, thereby separating the Memorial Park from the Basin Reserve Historic Area
- ii) block easy surveillance of the area

- iii) block easy walking access to War Memorial Park from Cambridge Terrace
- iv) create an unnecessarily steep slope below which requires the circuitous and arbitrary arrangement of paths to manage the gradient
- v) contribute to an unsafe environment

2.4 In summary, I believe the crèche's relocation is unsound in principle, purpose and outcome.

3 Retention of the crèche in its existing location

3.1 Reasons for the retention and protection of the crèche in its existing location are:

- i) the historical importance of the creche's existing location
- ii) the increasing stature of the person associated with its existing location
- iii) the contribution of the crèche to the Basin Reserve Historic Area, both of which can be enhanced
- iv) the availability of alternative transport proposals to the Basin Bridge Proposal which do not require movement of the crèche
- v) a positive landscape and heritage setting for the existing location of the crèche can be provided by an amended or alternative landscape plan for this area in the War Memorial Park (and Extension)

4 Precedent for NZTA retaining a heritage building in its existing location

4.1 In 2006 Transit NZ applied for a Notice of Requirement and resource consents for its SH1 Victoria Park Tunnel Project in Auckland, another transport project of national significance. The works included the permanent relocation of the Birdcage Hotel, an architecturally significant brick building constructed in 1886 on the original foreshore of Freemans Bay. NZTA argued that the hotel needed to be relocated to construct the tunnel.

4.2 I presented evidence to the hearing that showed how the tunnel could be built and the hotel could be returned afterwards to its original location on top of the tunnel. The different outcome meant that the project would maintain the building's important historical and social relationships with the area, as well as protect its relationship to the open space in front of it. The benefits would be amplified with NZTA's stated plan to remove the Victoria Park flyover in the future.

4.3 My practice developed many design drawings in order to promote this outcome, as well as to convey how this could be achieved practically. Engineering advice determined that moving the hotel twice presented no further structural or heritage risk and only minor additional costs.

4.4 We gained support from city and regional councils, the local community board, community groups, adjacent landowners, heritage and engineering experts and urban design professionals. NZTA confirmed in June 2010 that it would return the hotel to its original position and in April 2011 successfully carried this out.

4.5 **Even though the resource consents granted for the Victoria Park Tunnel Project approved the permanent relocation of the hotel, NZTA agreed to return the hotel to its original site.**

- 4.6 The engineering consultant engaged by NZTA to move the Birdcage Hotel is the same engineer engaged for moving the crèche.

5 Precedent for the Ministry for Culture and Heritage adopting an alternative to NZTA's plan

- 5.1 The Government's decision to underground Buckle Street in front of the National War Memorial in early August 2012 went against NZTA's preferred plan to retain the road at grade level in front of the Memorial.
- 5.2 I recommended the underpass approach to the Minister for Culture and Heritage, the Hon. Chris Finlayson and Mr Brodie Stubbs, Manager of the Ministry's Heritage Projects, in a meeting on 30 May 2012. I argued that removing the major traffic conflict between Buckle Street and Tory Street would deliver significant transport improvements for the state highway route which has since been verified by the Board's independent transport peer reviewers. The other secondary benefit from this undergrounding was the enabling of an appropriate commemorative open space above.
- 5.3 The Government's decision soon after this meeting led me to conclude it was based upon my insights, as both NZTA and the Architecture Centre's proposals for Buckle Street differed significantly from this outcome.

6 Reconsideration of the plan to relocate the crèche

- 6.1 The Minister for Culture and Heritage and Ministry officers might waive the granting of resource consents to relocate the crèche as part of the War Memorial Park (Pukeahu) Empowering Act, if it was shown:
- i) to be both unreasonable and not reasonably necessary
 - ii) the Basin Bridge Proposal was declined by the Board of Inquiry due to its significant adverse effects
 - iii) the Board of Inquiry recommended an alternative design be developed which balanced the transport objectives for the project with the need to protect and enhance the Basin Reserve Historic Area
 - iv) the Minister and Ministry of Arts, Culture and Heritage is presented with this alternative proposal which shows enhancement of the park, crèche building and setting can be achieved without the crèche's relocation

7 Basin Reserve Roundabout Enhancement Option (BRREO)

- 7.1 The BRREO proposal is not dependent upon the crèche being relocated. The BRREO proposal retains the crèche in its existing location.
- 7.2 BRREO can deliver multi-modal transport improvements and enhance the Basin Reserve Historic Area with the crèche in its original place. The crèche can also be enhanced as part of the BRREO proposal.
- 7.3 Our practice has prepared initial concepts which could be developed if the Basin Bridge Proposal was declined. We have allowed space for this enhancement in our design even if

we have not illustrated it yet. We would welcome the opportunity to create an appropriate setting for the crèche.

8 Conclusion

- 8.1 A positive heritage outcome for the crèche is not dependent upon the Ministry for Culture and Heritage granting the necessary resource consents for its relocation.
- 8.2 A positive heritage outcome for the crèche is not dependent upon its relocation.
- 8.3 Transport objectives and improvements for the Buckle Street Underpass and the Basin Bridge Project are not dependent upon the relocation of the crèche.
- 8.4 The retention or return of the crèche to its existing location will enable:
 - i) a positive heritage outcome for the crèche
 - ii) a positive heritage outcome for the Basin Reserve Historic Area
 - iii) a positive landscape and heritage setting for the crèche
 - iv) a positive and integrated landscape outcome for the park
 - v) transport objectives and improvements for the Basin Bridge Proposal to be balanced with other objectives and outcomes

Signed



Richard L C Reid

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