

BEFORE A BOARD OF ENQUIRY

IN THE MATTER of the Resource Management Act
1991 and its amendments and
regulations ("the Act")

AND

IN THE MATTER of a Notice of Requirement and
Resource Application by the New
Zealand Transport Agency in
respect of the Basin Bridge
Proposal

**OPENING STATEMENT ON BEHALF OF
THE MOUNT VICTORIA RESIDENTS' ASSOCIATION**

Date: 4 February 2014

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The Mount Mt Victoria Residents' Association

1. The Mount Victoria Residents' Association is an incorporated society and as such is a not for profit organisation.
2. The Association is also a charity registered with the Charities Commission.
3. Three of the objectives of the Association are as follows:
 - 3.1 Protecting the quality and heritage values of the built and natural environment of Mount Victoria to enhance its attributes as a place in which to live, and promoting its sustainable management.
 - 3.2 Working with other groups and organisations with similar objectives.
 - 3.3 Representing the interests of the Mount Victoria community.

Submission of the Mount Victoria Residents' Association

4. The Association has filed a submission in opposition to the Notice of Requirement and to the Resource Consent Applications by the New Zealand Transport Agency in respect of the Basin Bridge proposal.
5. The grounds for its opposition are set out in the submission and are as follows.
 - 5.1 The proposal does not promote the sustainable management of natural and physical resources.
 - 5.2 The proposal does not manage the use, development and protection of physical resources, in a way, or at a rate which will enable the people and community of Wellington to provide for their social, economic and cultural wellbeing and for their health and safety, while sustaining the potential of physical resources to meet the reasonably foreseeable needs of future generations; safeguarding the life-support and capacity of air, water, soil and eco-systems; and avoiding, remedying or mitigating the adverse effects of the proposal on the environment.

- 5.3 The proposal does not recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development, such recognition and provision being a matter of national importance.
- 5.4 The proposal does not provide for the efficient use and development of natural and physical resources; the maintenance and enhancement of amenity values; the maintenance and enhancement of the quality of the environment; the finite characteristics of physical resources; and the effects of climate change.
- 5.5 The effects on the environment of allowing the requirement will be significant and more than minor and the mitigation proposed will be inadequate to mitigate these adverse effects on the environment.
- 5.6 The proposal is inconsistent with the Wellington Regional Plan and with the Wellington City District Plan.
- 5.7 The proposal is inconsistent with the Wellington Regional Land Transport Strategy.
- 5.8 The proposal is inconsistent with the NZ Urban Design Protocol.
- 5.9 Adequate consideration has not been given to alternative sites, routes, or methods of undertaking the work. In particular, adequate consideration has not been given to a proposal comprising the following:
- 5.9.1 An alternative which maximises the use of the existing road network and retains and improves the function and pivotal role of the existing Basin Reserve Roundabout.
- 5.9.2 This alternative involves increasing the capacity, efficiency and reliability of the Roundabout and provides opportunities for improved public transport, cycling and walking. This alternative has regard to and accommodates the publicly stated intention to construct a second Mt Vic Tunnel.
- 5.9.3 The alternative proposal integrates with, reflects and enhances the historic, urban, landscape and open space environment of the Basin Reserve Area, as well as the approaches to and from it.

6. The work and the proposed designation are not reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought.

Relief Sought by the Mount Victoria Residents' Association

7. The relief sought by the Mount Victoria Residents' Association is that this Board of Enquiry declines to recommend that NZTA confirm the requirement and declines consent to the resource consent applications made by NZTA.

Overview

8. The proposed bridge and its adverse effects will affect not only the Basin Reserve Historic Area but the whole city. It is contrary to the vision of Wellington towards 2040.
9. The application is premature and piecemeal.
10. The time travel benefit claimed for the bridge, assuming it eventuates, will be at the cost of irreversible adverse effects on the Basin Reserve Historic Area and its environs.
11. A decrease in adverse effects in one area by the removal of traffic cannot be justified when the resultant increase in adverse effects from its relocation to another area compromises that area permanently and the visual impact of traffic is increased
12. Transport improvements can and should build upon, extend and enhance the historic structure and unique character of the receiving environment rather than changing it fundamentally and adversely.
13. As stated in The Joint Statement of the urban design, landscape and architectural witnesses, "*an "at grade" solution is preferred if the requirements for traffic movement can be met*".
14. The proposal introduces buildings and planting to mitigate fundamental problems which only add to the confused spatial structure

15. An upgrade of the existing Roundabout at grade can meet the Project's objectives. There is no compelling evidence for the need to create an entirely new context to accommodate an increase in traffic capacity at the expense of the receiving environment.
16. The Basin Reserve Roundabout Enhanced Option developed by Richard Reid with the assistance of John Foster and David Young is an elegant solution. It looks deceptively simple but reflects careful design and years of expertise. It will address current issues and is able to accommodate the traffic flows resulting from the second tunnel if it is ever built.

What is the “Problem”

17. The traffic problem has not been correctly identified, measured and resolved by NZTA.
18. The key bottlenecks in the road network are outside the performance of the Roundabout and create significant downstream effects influencing the performance of the Roundabout.
19. These are:
 - 19.1 The limitation of only one Mt Victoria Tunnel, which without duplication will continue to cause significant congestion and constraints in use of the route.
 - 19.2 The signalled Buckle St/Tory intersection which is currently being removed through construction of the Buckle Street Underpass.
 - 19.3 The more distant Taranaki St and Terrace Tunnel.
 - 19.4 The existing congestion on Adelaide Road, especially for other vehicular traffic heading north in the peak afternoon hours between 4-6 pm.
20. These traffic problems are outside this project and will not be solved by this project. Other problems include the inefficient management of the existing Roundabout and the significant underutilisation of Roundabout lanes.

The Need for Balance

21. The long term vision for the Ngauranga to Airport Corridor Plan states *“Traffic congestion through the corridor will be managed at levels that balance the need for access against the ability to fully provide for peak demands due to community impacts and cost constraints”*. Providing for peak demand is not an absolute. Building more roads continually reduces the city footprint. It is a downward spiral that results in the despoliation of a city. It is the antithesis of the vision for Wellington.

The Meaning of Separation

22. Grade-separation is a term which has been incorrectly applied by NZTA to the Ngauranga to Airport Corridor Plan. The Plan clearly states: *“Design and construct improvements at the Basin Reserve to improve passenger transport, walking and cycling by separating north-south flows from east-west traffic.”*
23. Whilst NZTA has chosen to interpret “separation” as grade-separation, and successive studies have generally followed this interpretation, the Plan’s wording is open to achieving separation by other means. Separation of traffic flows can be simply achieved through phasing of traffic lights and the layout of traffic lanes.

International Best Practice

24. Current international best urban design practice supports highway systems between cities and towns but not in cities and towns. The last 20 years has seen the removal of many highways within cities due to their detrimental effect on the precincts in which they are located and the overall disruption to the continuity of urban areas.
25. The key problem with grade separated structures is they sever one part of a city from another. The severance has serious implications for the community in terms of loss of social cohesion; dominance of cars over walking, cycling and public transport; fragmentation of the urban fabric and the wastage of land. Additional impacts are the visual dominance of the structures in the urban landscape and the negative impact on both the economic vitality of a place and property values.

26. The effects of a grade separated structure is evident in this project. The number, scale and limited effectiveness of mitigation elements clearly illustrate that there is a fundamental problem with the introduction of a grade-separated structure at the Basin Reserve.
27. The assumption that grade separation is required and that it is acceptable also indicates that the transport planning is out of step with international best practice where integration of traffic, public transport, pedestrians and cyclists in many cities has resulted in better safety and improved traffic flows.
28. It also indicates that the interpretation of separation as “grade separated” may have been formed without an appropriate level of transport and urban design skills; respect for the context; adherence to the relevant strategies and policies; and subsequent investigation of alternative options.

Outmoded thinking

29. The bridge has been on the table for fifty years even though the city’s population and settlement pattern has not required one.
30. Since the 1963 Foothills Motorway Plan, all of the Transport Agency’s proposals have followed the same governing formula – they have sought to divert east-west traffic on Paterson St northwards over or around the Basin Reserve, either grade-separated on a bridge or in a tunnel structure.
31. All these schemes have envisaged and required the almost wholesale destruction of the Basin Reserve Cricket Ground to justify their feasibility. The current NZTA application is no different in conception or outcome, even if NZTA argues that the alignment of the flyover on the Te Aro Grid is an advance in thinking.
32. If the Project requires the incorporation of the “Northern Gateway Building” within the Basin Reserve Ground purely and simply to mitigate the effects of a grade-separated structure outside the Ground, then NZTA’s thinking about cities and traffic movement has not changed in fifty years.

33. By comparison, in those fifty years, the world has experienced a quantum change in attitudes whether driven by the electronic era or by peoples' expectations of environment quality.

The Vivian Street Precedent

34. NZTA has examined the future requirements of Vivian St up until 2031 and has established that these can be met at-grade by removing car parking during peak hours between Tory St and Kent Tce to allow 3 lanes of traffic flow.
35. This form of future-proofing is low impact, low cost, small scale in intervention and if sustainable in light of predicted traffic growth, has an impressive degree of longevity.
36. NZTA's reconsideration of Vivian St is an appropriate precedent for transport improvements to be undertaken at the Basin Reserve Roundabout. The Basin Reserve roundabout suffers from an inefficient utilisation of space and a flyover is an overinvestment in infrastructure as a response to simple on-the-ground problems.

The Adverse effects of the Bridge

37. The Basin Bridge Proposal will create permanent adverse effects for the Basin Reserve and the city which will be significant and significantly more than minor.
- 37.1 The departure of the project from the 1840 'Mein Smith' Plan as the foundational building block for the development of the city which all subsequent plans including the 'Wellington 2040: Smart Capital' (2011) have been based upon.
- 37.2 The loss of spatial continuity along the city's major north-south axis from Wellington Harbour to Cook Strait and the consequent division of the city north and south of the flyover.
- 37.3 The segregation of both Government House and the National War Memorial on the 'south' side of the flyover.

- 37.4 The bridge will undermine the 'high ground' of the Mt Cook 'knoll' that the Dominion Museum and War National War Memorial stands upon which is the major landform and commemorative precinct of the city, by neutralising the landform's prominence in the round when seen from Kent Tce and Basin surrounds and severing visual links to the monuments from the same locations.
- 37.5 The dominance of the project relative to the size, form and grain of the city and its immediate setting in a sensitive, historic, civic and residential precinct.
- 37.6 The interruption to the dramatic entry into Wellington through the Mount Victoria Tunnel.
- 37.7 The impact on the Basin Reserve as a key place in the city in terms of its natural and cultural history, social importance as the only heritage-listed cricket ground in New Zealand, spatial character, urban context, landscape setting and recreational ambience; and prevent the future potential to strengthen the intrinsic qualities of the Basin Reserve rather than impose unrelated features upon it.
- 37.8 The loss of the Basin Reserve Roundabout as a key organising element for movement in the city and as a key component of the historic urban structure of the city.
- 37.9 The loss of the urban structure of the Roundabout at ground level (the historic Sussex Square).
- 37.10 The creation of a wasteland left-over space associated with motorway infrastructure.
- 37.11 The creation of left-over land loses the opportunity for urban infill development with related urban form and economic benefits.
- 37.12 The negative impacts on Wellington as a compact walkable city and the international/national recognition and reputation of Wellington as a smart capital and compact walkable city.
- 37.13 The likelihood of antisocial behaviour under the flyover is very high due to the low height of the flyover; the large amount of undefined space that is left over, and the creation of a landscape oriented towards vehicles.
- 37.14 Compromise of legibility, accessibility and safety of pedestrian routes.

- 37.15 The loss of east-west and north-south view shafts in the inner city. These view corridors are unique to Wellington and enable the dramatic landform to be read through the street pattern.
- 37.16 The flyover negates to a large extent any value gained by locating the highway under Memorial Park.

Key Failures in NZTA Assessment

38. There are key failures in NZTA's assessment of the Basin Bridge proposal. These include the following:
- 38.1 The failure to assess the project in relation to the economic impact on Wellington City as a whole and adequately take into account the 'City Centre Movement Infrastructure Analysis' Space Syntax Report for Wellington 2040: Spatial Structure Plan (2011).
- 38.2 The failure to consider current international best practice which has demonstrated that integration rather than separation of traffic within cities results in a safer environment and improved traffic flow.
- 38.3 Provides no assessment as to the property devaluation of those properties directly affected.
- 38.4 The failure to properly assess an 'at-grade solution', particularly in light of the Urban Design Expert Conferencing Statement in which there was unanimous agreement that an at-grade solution, if workable, would be superior because of the acceptance that there are so many inherent problems with the project.

Key Failures of Project

39. In terms of the strategic objectives for the city defined by the Wellington City Council, the project does not make Wellington:
- Safer and more liveable
 - More sustainable
 - Better connected

- More prosperous
- More compact
- More memorable and distinctive
- People centred
- An Eco-City
- A dynamic central city

40. In terms of the transport strategies for the city supported by Wellington City Council, the project does not:

- *deliver an integrated land transport network that supports the region's people and prosperity in a way that is economically, environmentally and socially sustainable".*
- *support Wellington to become even more vibrant, eco-friendly, resilient, diverse and internationally connected.*
- *assist the city in becoming a compact city centre with a low environment footprint, high quality recreational and open spaces and attractive waterfront".*

Proposed mitigation of the flyover creates significant adverse effects

41. NZTA's Project includes mitigation of the flyover structure. This mitigation mostly reacts arbitrarily to the adverse effects of the flyover rather than responds to and builds upon the character, quality and place of the Basin Reserve Historic Area;
42. The only part of the Project whose genesis appears not purely related to the Project's adverse effects, the extension to Memorial Park, is not exclusive to the Project and can be included as part of other projects, including the Basin Reserve Roundabout Enhancement Option.;
43. The Northern Gateway Building is proposed as a substantial form of mitigation for the significant adverse effects of the grade-separated flyover. However, the Northern Gateway Building creates its own significant adverse effects and should be removed as

part of the project or declined together with the rest of the application. Regardless of whether this building is 45metres, 55m or 65m long, it is in the wrong place and does not fit within the careful organising structure of the Basin Reserve.

44. The proposed planting fills in the open space of the Roundabout rather than defines its edges e.g. on Dufferin St (north and south) and Kent Tce.

Basin Reserve Roundabout Enhancement Option

Function of roundabouts

45. Roundabouts are a legitimate and proven method of successfully organising movement in a city and shaping urban form and public space.
46. The singular focus of the City at the Basin Reserve Roundabout may be unique internationally. Other cities have roundabouts; other cities have famous roundabouts; and there are cities famous for their roundabouts. However, typically all these roundabouts are one nodal point within a complex network of movement corridors. Paris and Washington DC are the most well-known examples.
47. The Basin Reserve Roundabout Enhancement Option protects the critical function and symbolic role of the Roundabout as the key pivot point and traffic distributor for the city. The Roundabout's high order place within the urban structure and landscape context of the city is as important to retain and enhance as the rotary system at grade level.
48. The Basin Reserve Roundabout Enhancement Option reflects the expertise of a design team with proven skills and a history of successful and elegant resolution of traffic challenges.
49. Modifications to the street pattern and arrangement of lanes at the Roundabout have served to clarify and strengthen the organisational role of the Roundabout within the city rather than dilute or dismantle it.

50. The volume of traffic now using the Roundabout can be interpreted as a positive expression of the Roundabout's importance which can and should be better managed and enhanced, not treated as an adverse effect to be avoided or removed. Certainly, this is the accepted way for cities with famous roundabouts.
51. "Basin Reserve Roundabout Enhancement Option" has two objectives. It seeks a functional enhancement of traffic movement and an enhancement of the environment of the Roundabout. To this end the differing transport requirements have been sensitively integrated with the need to clarify the urban structure and enhance the amenity of this historic area of the city.
52. The Basin Reserve Roundabout Enhancement Option differs in important respects from the conceptual drawings Richard Reid & Associates supplied to Wellington City Council in January 2013 (the "RR Option").
53. The Basin Reserve Roundabout Enhancement Option is a feasible traffic solution and provides a strategic fit with WCC's growth strategy and with WCC's overall transport plans; GWRC's and WCC's transport strategies, NZTA's overall strategy for the Ngauranga to Airport Corridor Plan, and NZTA's plans for upgrading SH1 between the Terrace and Mt. Victoria Tunnels.
54. The Basin Reserve Roundabout Enhancement Option can also readily accommodate WCC's plans for pedestrian and cycling facilities and public transport.
55. The Basin Reserve Roundabout Enhancement Option is a holistic solution that achieves the Project's objectives whilst integrating these with the historic receiving environment.
56. The option reinforces the role of the Roundabout, defines the spatial structure of Kent and Cambridge Terrace and Adelaide Road and has no additional impacts on the adjacent suburbs. It enhances the great "bones" of Wellington to take it into the future.
57. If these streets were currently built at their planned future scale, alignment and use the introduction of a flyover would be unlikely to be considered. Degradation of the area around the Basin Reserve Precinct has meant that the proposed roading intervention appears more benign and less detrimental to the precinct and to the city.

58. The at-grade solution is an elegant solution. It looks deceptively simple but is highly effective.

“Simple does not mean simplistic. The quality of a layout lies in its functional, monumental [hierarchized] and dimensional [in terms of length, breadth and texture] relevance.” [Bernard Huet Page 14 . Article Attached].

59. An at-grade integrated solution avoids the need to mitigate any harmful impacts from the transport objectives. Over the long term, this option will reinforce the Roundabout as one of the major urban spaces of the city.
60. An at-grade solution retaining the southern alignment of the Roundabout can achieve the objectives of the Project without the significant adverse effects of the Basin Bridge Proposal. The Basin Reserve Roundabout Enhancement Option that John Foster, David Young and Richard Reid propose will provide the necessary transport improvements and enhance the amenity and quality of the Basin Reserve Historic Area. Overall, this alternative solution has very low impact, is extremely cost-effective and maximises the use of the existing transport network as required by the Ngauranga to Airport Corridor Plan.
61. An at-grade solution:
- is the best way to foreground an urban form and character to the historic area.
 - maintains and reinforces the historical, cultural and social significance of Sussex Square.
 - Reinforces the only urban space of its type and scale in Wellington and New Zealand.
 - Provides the spatial continuity between Kent/Cambridge Terrace and Adelaide Road.
 - Reinforces the entry experience from the Mount Victoria Tunnel into the inner city.

- Attracts pedestrian activity around the edges of the roundabout instead of being drawn towards vehicle movement in the centre.
- Maximises the value of the extension to Memorial Park.
- Enables the retention of all recognised buildings and features.

The Basin Reserve Roundabout Enhancement Option Solution

62. In essence, the Basin Reserve Roundabout Enhancement Option solves the key problems without destroying the existing context and without the need to create an entirely new context for the project by providing additional capacity outside the network at the expense of the receiving environment.
63. The Project objectives can be met without the Project. The existing road network has resisted NZTA's many attempts to engineer a motorway 'solution' over the past fifty years. The existing network has sufficient flexibility, tolerance and resilience to continue to serve the city well into the future.
64. The Basin Reserve Roundabout Enhancement Option, meets all of the objectives of the Project, has minimal impact and low cost, and has no significant adverse environmental effects.
65. The Board of Inquiry's decision on NZTA's application signals a profound moment in time. The potential of this project is either to impose an outmoded model of planning on the city and with its construction destroy the intrinsic order, scale and fabric of the city, dividing the city permanently north and south of the Basin Reserve; or alternatively, the project can consolidate and build upon the historic urban structure of the city with an integrated transport proposal.

Public Transport Spine Study

66. The application and the Public Transport Spine Study should be resolved together once a decision has been made on the Spine Study.

67. NZTA's application states that the layout of the Roundabout will be "complemented" by the Wellington Public Transport Spine Study. NZTA notes that the PT Spine Study "will determine the form of the passenger transport service" (Footnote 14: Introduction to the Project, Vol. 2 AEE, p.16).
68. The Public Transport Spine Study is currently in public consultation and will be determined through a separate decision-making process. NZTA's layout for the Roundabout can only be provisional until future decisions are made on the Public Transport Spine Study. The Public Transport Spine Study does not provide a layout for the Basin Reserve Roundabout for any of its short-listed options.
69. NZTA's Project has accommodated only one of the three short-listed options from the Public Transport Spine Study in its layout for the Roundabout, bus priority (essentially the status quo with priority signalling and dedicated bus lanes at peak hours) which is not Greater Wellington Regional Council's preferred option of Bus Rapid Transit.
70. NZTA and the Public Transport Spine Study are reliant on each other for their promise of traffic performance despite the fact that neither are able to demonstrate improved Public Transport performance at the Roundabout.
71. A key NZTA Project Objective, namely the provision of opportunities for public transport improvements, is not able to be confirmed or tested until after the Board of Inquiry process is likely to have been completed. These independent plans and separate decisions leave uncertain the overall outcome from the different projects. On this basis alone, NZTA's application for the Project is premature and piecemeal and should be declined.

The Matter of Heritage

72. The Minister for the Environment determined that NZTA's Notice of Requirement and Resource Consent application constituted a proposal of National significance and directed that those matters be referred to a Board of Enquiry for Decision.
73. The Minister set out five reasons why she considered that the matters constituted a proposal of national significance. One of those reasons is as follows:

“The proposal is adjacent to an partially within the Basin Reserve Historic Area and international test cricket ground; in the vicinity of other historic places including the former Home of Compassion Crèche, the former Mount Cook Police Station, Government House and the former National Art Gallery and Dominion Museum; and is adjacent to the National War Memorial Park (Pukeahu). The proposal is likely to affect recreational, memorial, and heritage values associated with this area of national significance (including associated structures, features and places) which contribute to New Zealand's national identity.”

74. The matter of heritage is a key issue in NZTA's proposal. Indeed it is the only matter of national importance relevant to the assessment of this proposal. It is well established that the protection accorded an item of historic heritage includes the curtilage of that item. This has been recognised by the undergrounding of Buckle Street in front of the National Museum mere metres to the west.
75. It is ironic that in this context, NZTA is promoting a proposal to build an intrusive and environmentally damaging concrete structure in the face of a significant heritage item and within metres of highly significant heritage elements which have importance in the local context, the regional context and the national context.

The Need for an Integrated Resource Management Process

76. It is well established that best resource management practice requires the integration of all elements of a proposal in order to enable the consent authority to properly assess all of the effects of a proposal, both positive and adverse, and to properly evaluate the

outcomes claimed for it. This proposal flies in the face of that well established practice and the majority of the benefits claimed for it are dependent on other projects which may or may not proceed.

77. The piecemeal approach inherent in this proposal has the potential to “freeze frame” elements of the so-called solution which subsequent elements and related hearings may determine unnecessary to the disadvantage of all concerned.
78. The scale of the project and the need for staging is a reason which has been advanced to justify this piecemeal approach. There is no reason why staging cannot be sought and consented to in the context of an integrated proposal.
79. Furthermore, there is no urgency about the proposal as the concept of a bridge has been on the books as an unimplemented possibility for over 50 years. There will be no adverse consequences resulting from delay to permit a fully informed and integrated assessment of all elements of the proposal which claims to deliver the promised benefits.

Failure to Adequately Consider Alternative Routes and Methods

80. Whilst NZTA has listed a plethora of alternatives it claims to have considered, it appears that most of these alternatives have been based on grade separation around the Basin Reserve.
81. This approach has adversely affected NZTA’s ability to consider other alternatives, especially alternatives at grade with an open mind.
82. In particular, it is abundantly clear that NZTA has not considered the Basin Reserve Roundabout Enhancement Option prior to issuing its Notice of Requirement.
83. Consideration of that option now cannot be said to form part of the consideration of alternatives in terms of section 171 of the Act.

The Test of Reasonable Necessity

84. It is arguable that the overall project is reasonably necessary to achieve NZTA's stated objectives.
85. However the Board, when considering the requirement and the associated resource consent applications, must, subject to Part 2 of the Act, consider the effects on the environment of the requirement and the resource consent applications.
86. In doing so, the Board is directed to have regard to the matters set out in Section 171(1) of the Act.
87. In this context the matter of reasonable necessity is but one element in the mix.
88. It is the contention of the Mount Victoria Residents' Association that any "*reasonable necessity*" is dramatically outweighed by Part 2 considerations and the effects on the environment of the requirement.

Summary of Traffic Matters

89. There is a low-cost option of upgrading the existing Basin Roundabout by widening Paterson Street westbound up to the Dufferin Street stop line and widening Dufferin Street to between Paterson Street and Rugby Street, in each case to three lanes, to provide three continuous lanes westbound around the roundabout from the exit from the Mt Victoria Tunnel to Buckle Street/Karo Drive.
90. No improvements to the existing roundabout are required until the Mt Victoria Tunnel is duplicated.
91. Capacity improvements at the Basin will be required when the Mt Victoria Tunnel is duplicated but the Basin Roundabout Enhancements Option is sufficient to provide the capacity required to handle the additional traffic arising from the proposed duplication of the Mt Victoria Tunnel and normal traffic growth without the need for a Basin Bridge as proposed by NZTA (or any other major works).

92. The Basin Roundabout Enhancements Option can cater adequately for other transport modes, notably buses, cyclists and pedestrians – in particular, the proposed enhancements will enable public transport priority arrangements to be provided in and through the Basin Roundabout similar to those enabled by the Basin Bridge Proposal.
93. The Basin Roundabout Enhancements Option will be effective in meeting NZTA's objectives for the Project and in providing a strategic fit with NZTA's strategy for SH1: Ngauranga to Airport and, in particular, with NZTA's strategy for SH1 between the Terrace Tunnel and the Mt Victoria Tunnel.
94. The Basin Bridge Proposal, compared to the Basin Roundabout Enhancements Option, will offer only minimal traffic and other transport benefits, and no significant benefits to Wellington's economic growth. Hence, the Basin Bridge Proposal is uneconomic when compared to the Basin Roundabout Enhancements Option.
95. The Basin Roundabout Enhancements Option will also avoid the significant environmental effects of the Basin Bridge Proposal which have not been properly taken into account by NZTA in its assessment of the proposed bridge.
96. The Basin Roundabout Enhancements Option was not identified and considered by NZTA during the investigation and consultation process. Accordingly, in the consultation process, affected parties did not have the opportunity to consider, as an alternative to the Basin Bridge Proposal, the option of enhancements to the existing Basin Roundabout which would meet the transport objectives of the Project and avoid the significant environmental effects of the Basin Bridge Proposal. Similarly, NZTA did not consider the Basin Roundabout Enhancements Option in the process of investigating and selecting the Basin Bridge Proposal as its preferred scheme.
97. The process followed in developing the proposal is seriously defective in that:
 - The significance of the presence of bottlenecks at key locations in the arterial network has not been given adequate prominence.

- The presence of bottlenecks on both state highway entrances to the Te Aro area will ensure that traffic volumes in the vicinity of the Basin Reserve will remain at present levels until the tunnels are duplicated.
- The study has incorrectly assumed that congestion will soon occur round the Basin Reserve that requires urgent treatment.
- The significance of the removal of the Tory/Tasman Street intersection and the provision of an additional lane on the Taranaki Street approach beneath the Memorial Park on future effective operation of SH 1 has not been properly incorporated in the study process.
- A failure to investigate the obvious alternative of minor improvements to the existing facility has resulted in the adoption of an inappropriate base case for establishing the potential benefits of the proposal.
- The analytical procedure followed in estimating the benefits of the proposal is based on a seriously defective model structure that produces inconsistent results.
- The amount of the reduction in travel time claimed following construction of the proposal is not well founded.
- Adequate capacity will be available once the Memorial Park development is opened to ensure effective and safe operation of the westbound section of SH 1.

Evidence to be Called

98. The Mount Victoria Residents' Association will call the following evidence:

- Elaine Hampton, President of the Mount Victoria Residents' Association;
- Dr Marie O'Sullivan – Health Impacts;
- Jan McCredie – Urban Design and Architectural;
- Richard Reid – Urban Design, Architectural and Infrastructure Planning;

99. The Mount Victoria Residents' Association will also be sharing the following witnesses:

- David Young – Transport;
- John Foster – Transport.

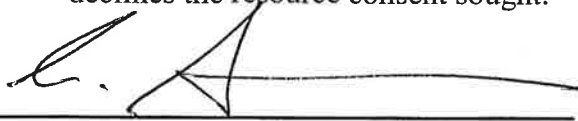
Conclusion

100. In conclusion the position of the Mount Victoria Residents' Association is as follows:

- The adverse effects on the environment of allowing the requirement will be significant, irreversible, and more the minor.
- The proposal is inconsistent with Part 2 of the Act.
- The proposal does not recognise and provide for the protection of historic heritage from inappropriate subdivision use and development which is a matter of national importance.
- NZTA has not given adequate consideration to alternative sites and methods of undertaking the work.
- In the circumstances, this particular piece of work and designation are not reasonably necessary for achieving the objectives of the requiring authority.

Relief Sought by the Mount Victoria Residents' Association

101. As earlier stated, the relief sought by the Mount Victoria Residents' Association is that this Board of Enquiry declines to recommend that NZTA confirm the requirement and declines the resource consent sought.



C Anastasiou
Counsel for The Mount Victoria Residents Association

