

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"/> |
| Reason including any suggested conditions | See Appendix 1 attached | | | | | |

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. | See Appendix 1 attached |
|--|-------------------------|

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'.

If you have a position or opinion on these matters please indicate your position on them and give reasons for that position 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 as well as the matter to which the additional pages relate.

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.

Richard Reid & Associates Ltd opposes the Notice of Requirement, the designation sought by the Notice of Requirement and the associated Resource Consents sought. The reasons for our opposition are set out in Appendix 1 attached to this submission.

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

8. How would you like to receive correspondence?

Formal service of documents will be by way of the EPA website at www.epa.govt.nz.

For efficiency, as well as environmental and cost reasons, the EPA sends out its correspondence via email. We usually provide links to documents on our website rather than emailing documents. This saves people the trouble of downloading large files that they may not want.

We will send all information and correspondence including copies of the draft and final reports to the email address that is provided in Part A of the Submission Form.

If for any reason you cannot receive documents by email please indicate this by ticking the box below. This will ensure that, where possible, paper copies of all information will be sent to you.

If you choose to receive paper copies and wish to speak at the hearing, a lot of information such as evidence, hearing schedules, board directions and reports will need to be posted to you. However it may not always be feasible for paper copies to be made available to you in a timely manner (for example, the hearing schedule may change daily during the hearing).

In some instances, when there is a large volume of information, we may refer you to a location where this documentation is publicly available for inspection, such as a library, even if you indicate a preference for receiving paper copies.

If you prefer to receive hard copies of all the information please tick the box below.

- We wish to receive **paper** copies of documents where possible in addition to email correspondence.

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.

*If you indicate on your submission that you **do not** want to speak at the hearing, you will not receive further correspondence from us until the draft decision report is sent to you. You can still access all information via our website.*

*If you indicate you **do** wish to speak at the hearing we will contact you prior to the hearing to confirm your intention and how long you will need for your presentation to the Board.*

Many submitters speak on similar topics and issues. If this applies to one or more of your topics of interest then you may consider presenting a joint case at the hearing. If you wish to do this, please indicate this by ticking the box. The Friend of Submitter will be able to assist submitters who are prepared to make joint cases – please refer to the Information Sheet for details on how to contact the Friend of Submitter.

If you do not select an option, we will assume you wish to speak about your submission.

- We **do** wish to speak about our submission
- If others make a similar submission, we will consider presenting a joint case with them at the hearing.

We request that the date for the start of the hearing be changed to the beginning of the fourth week of January 2014 (20th -) or later, as the indicative date of 13 January is unreasonable.

10. Do you intend to provide expert witnesses?

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

An expert witness is a person who, through training or experience, is a skilled practitioner in a particular subject and is able to give professional evidence on that particular subject. All experts are expected to comply with Environment Court Practice Note 2011 (available at www.justice.govt.nz/courts/environment-court/legislation-and-resources/practice-notes/practice-notes), and be prepared to be cross-examined.

If you consider yourself to be an expert or you intend to provide evidence from expert witnesses please tick the box below.

Yes, **we do have** expert witnesses. I also consider I have expertise to be considered an expert.

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 |
|-----------------|----------------------|--------------|---------------|
|-----------------|----------------------|--------------|---------------|

The names, areas of expertise and contact particulars of our expert witnesses will be provided to the Board in due course.

Where to send your submission

Your submission must be received by the EPA no later than **5.00pm on Friday 6 September 2013**. You also need to send a copy of your submission to the applicant (the NZ Transport Agency).

You can send your submission to the EPA either by:

- **Completing online** at www.epa.govt.nz/Resource-management/Basin_Bridge
- **Email** to basinbridge@epa.govt.nz, (if smaller than 10MB). Please mark the subject line: Submission: (your name), Basin Bridge Proposal
- **Fax** (04) 914 0433. Please mark the subject line: Submission: (your name), Basin Bridge Proposal
- **Post** either in hard copy or on an electronic storage device (if larger than 10MB), to the Environmental Protection Authority, Basin Bridge Proposal, Private Bag 63002, Waterloo Quay, Wellington 6140
- **Deliver in person** to the EPA Head Office, Level 10, 215 Lambton Quay, Wellington marked for the attention of Shannon Wallace

You can send a copy of your submission to the NZTA either by:

- **Completing online** – if you make an online submission a copy is sent to the applicant automatically
 - **Email** to greg.lee@nzta.govt.nz
 - **Fax** to (04) 894 3305
 - **Post** to New Zealand Transport Agency, Private Bag 6995, Wellington 6141
 - **Delivered in person** to New Zealand Transport Agency, National Office, Victoria Arcade, 50 Victoria Street, Wellington, marked for the attention of Greg Lee.
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BASIN BRIDGE PROPOSAL: EPA Ref No: NSP026

Submitter: Richard Reid & Associates Ltd

Appendix 1: Part B.5 – Reasons for opposing the proposal

Part B.6 – Reasons to decline the proposal

Part B.7 – Comments on planning matters

1. The proposal does not promote the sustainable management of natural and physical resources.
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.
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.
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. 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.
6. The proposal is inconsistent with the Wellington Regional Plan and with the Wellington City District Plan.
7. The proposal is inconsistent with the Wellington Regional Land Transport Strategy.
8. The proposal is inconsistent with the NZ Urban Design Protocol.
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:

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.

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.

This alternative proposal has been developed by the submitter and 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.
10. The work and the proposed designation are not reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought.