

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

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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.

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**Witness Concise Summary of Richard Leonard Cheyne Reid  
for the Mt Victoria Residents Association and Richard Reid  
& Associates Ltd**

11 April 2014

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

2 Below I provide a concise summary of my evidence-in-chief, rebuttal evidence and supplementary evidence on Urban Design / Architecture / Landscape Architecture / Visual matters. I have provided references to images from my evidence, as well as from NZTA's Basin Bridge Proposal and supporting evidence.

3 This concise summary should be read in conjunction with my concise summary for transport planning.

### **Summary of evidence**

4 In my opinion the effects from the design of the Basin Bridge Proposal are significant and adverse. The Proposal is out of character with the Basin Reserve Historic Area and is incompatible with the future vision of the city expressed in 'Wellington 2040: Smart Capital'. The flyover's effects will not be able to be absorbed by the receiving environment and the mitigation proposed will be both inadequate to mitigate these adverse effects on the environment and will exacerbate them. NZTA's application should be **declined**.

5 An alternative option submitted, the Basin Reserve Roundabout Enhancement Option (BRREO), shows how the Objectives for the Project can be met with minimal impact and low cost. The Project Objectives can also be used to enhance the historic structure, unique character and sensitive environment of the Basin Reserve Historic Area. BRREO gives the city directions for achieving the vision expressed in 'Wellington 2040: Smart Capital'.

### **Historical context for the Project**

6 The Basin Reserve Roundabout has sustained fifty years of the Transport Agency and its previous incarnations' proposals to transform it. The significance of the Roundabout's persistence in the face of profound global changes in thinking about the design of cities should not be underestimated.

7 Since the 1963 Foothill Motorway Plan, the Transport Agency's proposals for this Project have generally followed the same governing formula – they have sought

to divert regional traffic on Paterson St northwards over or around the Basin Reserve Cricket Ground, either grade-separated on a flyover or in a tunnel structure. The majority of route options considered by NZTA since 2001 reinforce this trend.

- 8 All these schemes require the destruction of a significant part of the Basin Reserve Historic Area and in particular the Basin Reserve Cricket Ground to enable 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 their thinking.
- 9 If the Basin Bridge Proposal requires the incorporation of the Northern Gateway Building within the Basin Reserve Cricket Ground purely to mitigate the effects of a motorway structure outside the ground, then NZTA's thinking about cities and traffic movement has not changed in fifty years.
- 10 NZTA's approach is out of step with international best practice which favours a more balanced approach to the provision of infrastructure; one where the integration of transport with land uses supports and serves the city in a way that does not physically dismantle or destroy significant parts of the city.

### **City and landscape context for the Project**

- 11 The Basin Reserve Roundabout occupies a high order place within the urban structure and landscape context of Wellington. It is the key pivot point and major traffic distributor for the city. The City turns upon the Roundabout.
- 12 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. In Wellington, the Roundabout structures the city in a primary, deep and symbolic way. **[BRR\_450]**
- 13 The meeting of arterial and principal roads at the Basin Reserve Roundabout is closely aligned with the cardinal points of the compass and the underlying 1840 Mein Smith City Plan. The reinforcement of the north-south and east-west axes are reflected at a number of scales:

- i) At the high order level of the city, the major north-south axis (Kent/Cambridge Terrace - Adelaide Road) and the major east-west axis (Paterson - Buckle Streets) meet at an orthogonal arrangement of roads formed by the historic Sussex Square (1860) surrounding the generous landscape space of the Basin Reserve Cricket Ground (1866). **[BRR\_450]**.
- ii) At the scale of the Basin Reserve's immediate setting, the Mt Victoria Tunnel and upper Paterson Street (both 1930) are aligned with the centre-point of the cricket ground and centre-line of the Museum Stand (1926), as well as the original boundaries of the Town Belt; **[McIndoe\_Rebuttal evidence\_Fig.3, although this is incorrectly drawn]**
- iii) Within the Basin Reserve, the siting of smaller scaled monuments and structures are also aligned with the cardinal points of the compass. The Museum Stand's relocated Edward Dixon clock (1890) terminates the western end of the Mt Victoria Tunnel/Museum Stand east-west axis; as the William Wakefield Memorial now marks the opposite side of the ground on this same axis; and the Reid and Dempster Gates mark the north and south alignments (although slightly off-centre to line up with the approaching footpaths). **[BRR\_474]**

14 The arrangement of the Basin Reserve also reflects the surrounding landform of the city and the structure of the 1840 Mein Smith City Plan:

- i) The buildings sited on the western half are grounded on the slope of the Mt. Cook knoll and by the weight of the Dominion Museum and Carillon behind
- ii) The landscape embankment encircling the eastern half is reflected by the Town Belt behind.
- iii) The cricket pitch is a tranquil open space between which 'pools' the flow of open space moving along the north-south corridor between Kent/Cambridge Tce and Adelaide Rd. This flow will become more evident over time with bigger scaled urban development defining the edges of the WCC Growth Spine **[BRR\_462] [BRR\_001] [BRR\_511]**

iv) At the larger scale of the city, the Basin Reserve nestles inside the horseshoe shape of the Town Belt, making the ground a stage within an impressive amphitheatre setting [BRR\_451]

15 These subtle inter-relationships and shared alignments have been **intentionally planned**. Their consistency connects the vision of the City Plan with the detailed layout of buildings, landscape and space on the ground. The same order at every level illustrates citymaking at its finest: an awareness, a skill and an outcome which we admire in other cities in other places of the world yet which is in danger of being cast aside here.

16 The design of the Basin Bridge Proposal, with its supporting evidence, demonstrates that it is unaware of these relationships and alignments; or unconcerned with them.

17 The flyover and its proposed mitigation will dismantle the underlying spatial structure of the City Plan, the Basin Reserve Roundabout and the Basin Reserve Cricket Ground. The Proposal will create a spatial hierarchy in which all these important relationships and alignments lose their definition and the flyover becomes the dominant element.

### **The Proposal's adverse effects**

#### *Planning effects*

18 The flyover creates a multitude of adverse effects, each one of which I consider significant. I have summarised these from my evidence as follows. The flyover:

- i) imposes itself upon and passes through the Basin Reserve Historic Area but does not contribute any enhancement of it;
- ii) its direction is against the flow and grain of the city;
- iii) it divides the city north and south of the Basin Reserve;
- iv) it diminishes the 'high ground' of the Mt Cook 'knoll' that the Dominion Museum and War National War Memorial stands upon, the major landform and commemorative precinct of the city;
- v) it adversely affects the relationship between the major national civic functions of state located adjacent to and surrounding the Roundabout (Government House, National War Memorial Museum and Carillon, Memorial Park)

- vi) it visually intrudes upon the north-south city axis viewshaft, the most important north-south axis in the city;
- vii) it dismantles the urban structure of the Roundabout at ground level, disengages the Basin Reserve Roundabout from the historic Te Aro Grid and erodes important traces of the historic Sussex Square;
- viii) it is fundamentally out of scale with the fine grained fabric and texture of the Mt Victoria residential suburb; and destroys the existing sympathetic transition in scale, character and building fabric between the Basin Reserve and historic suburb;
- ix) it is squeezed within an overloaded built environment which the Northern Gateway Building contributes to by being in the wrong place. The flyover's fit is a poor one and its alignment is compromised rather than balanced;
- x) the finer horizontal line of the Kent Tce crossing is undermined by the overwhelming curvature of the structure as it turns from Paterson St to Kent Tce; the length of the double curvature, approximately 2/3 of the overall length of the flyover, outweighs any gain from the 1/3 which is straight;
- xi) its shape and length has much more in common with the landscape typology of the Haitaitai street pattern than the Te Aro City Grid;
- xii) its embankment destroys any notion of a "hill to hill" span;
- xiii) it creates a vehicle dominated open space environment and wasteland left-over spaces from its operation;
- xiv) it removes the opportunity for urban infill development, urban regeneration, and maintaining a compact and connected city;

*Effects experienced on the ground*

19 NZTA's Proposal creates a very complex and hostile walking environment, particularly in the north-eastern and south-eastern quadrants of the roundabout. I have summarised related issues from my evidence as:

- i) the location of shared walking and cycle lanes in narrow corridors directly alongside and between traffic lanes;
- ii) poor access and alignment of walking routes;
- iii) poor legibility and surveillance of these routes because of the infill of open space with mitigation planting and the loss of street activity through the removal of built development;
- iv) poor demarcation and erosion of the Roundabout's edges which serves to decrease pedestrian activity and de-stabilise pedestrian safety. This will

particularly affect Dufferin St where the edges are poorly defined through public space bleeding into the NZTA owned land/St Joseph's Church car park. Jane Jacobs writes that the dissolution of a public space/private space boundary, decrease in informal street surveillance and irregular pedestrian use inevitably leads to unsafe streets;

- v) the discharging of bus passengers onto crowded footpaths at Rugby St and Dufferin St before and after school;
- vi) the random protrusion of flyover and walking/cycle overbridge piers
- vii) swerving geometries and low undercrofts of these overhead structures which pedestrians are required to negotiate three times between Paterson St and Kent Tce
- viii) the spectrum of shading produced by the flyover and cycle overbridges
- ix) the confrontational aspect of the Paterson St embankment while walking down Ellice Street, along Dufferin Street and looking up Paterson Street. The embankment forms a solid barrier between the Mt Victoria community and the Basin Reserve and the Mt Victoria community and the school precinct;
- x) the transference of regional traffic from the roundabout onto the flyover increases the visual impact of the traffic and pedestrians have to negotiate a large area of no-man's land at ground level;
- xi) it creates a landscape oriented towards vehicles, and wasteland left-over spaces from its operation.

*Adverse effects from mitigation*

- 20 The Proposal introduces buildings and planting to mitigate the effects of the flyover but these only serve to highlight its fundamental problems.
- 21 The proposed mitigation extends the flyover's effects, further confusing and eroding the spatial structure of the city and Basin Reserve Historic Area and further contributing to the loss of amenity and reduction in quality of the environment.
- 22 The Basin Bridge Proposal's mitigation measures react arbitrarily to the adverse effects of the flyover rather than respond to and build upon the character, quality, place and structure of the Basin Reserve Historic Area.
- 23 The only part of the Proposal whose genesis appears not purely related to the Project's adverse effects, the Memorial Park Extension, is not exclusive to the

Project and can be included within other design proposals and city projects, including BRREO.

- 24 Both the Northern Gateway Building and proposed planting will infill important public open spaces in order to conceal views of the flyover rather than strengthen these open spaces and complement the existing setting.
- 25 Some of the mitigation planting may need to be removed in the future to make way for further transport infrastructure (Public Transport Spine/Bus Rapid Transit) so there is no guarantee of amenity or longevity.
- 26 The mitigation measures do not conceal views of the flyover and moving traffic from within the cricket ground to the extent required by the Basin Reserve Trust (BRT). Views of these will be visible from around the ground for players and spectators and the effects from these views are wider and more significant than those commented upon by BRT and documented by NZTA. The visual effects will negatively impact upon the values, performance, experience and amenity of the Basin Reserve.
- 27 I believe some of the visualisations prepared by Truescape present an inaccurate, unreal and misleading picture of the proposed mitigation. Proposed planting appears to be misrepresented in maturity, scale and density of habit. The 'gaps' in NZTA's mitigation will create the degree of negative impacts the BRT is concerned the project should avoid [**Truescape Viewpoint 306a – 7B.306A.E; 7B.306A.B; 7B.306A.O**].
- 28 The failure to mitigate views of the flyover and moving traffic to the degree necessary from inside the ground will endanger the ground's test status.
- 29 In Mr. Neely's opinion, loss of Test status would result in irreparable damage to the historical and cultural heritage of the Basin Reserve. In my opinion, the Project as proposed would also cause irreparable damage to the historical and cultural heritage of the city.
- 30 The views of the flyover will portray to a global TV audience that an internationally discredited and disputed transport vision has been built beside an internationally valued and respected cricket ground.



- 31 The Northern Gateway Building (NGB) is proposed as a substantial form of mitigation for the significant adverse effects of the 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.
- 32 The NGB is not intrinsically needed for the Basin Reserve. All the expert witnesses who signed the urban design/architecture/landscape architecture/visual joint witness statement agreed it should not be built if the flyover is declined [para 46, pg 11]. Its function is subordinate to its role as mitigation. Its length will be determined only by the degrees of effect it has on screening the flyover. Any length, whether it is 45m, 55m or 65m, is demonstrative proof of the significant adverse effects of the flyover. Any length will create significant adverse effects for the Basin Reserve.
- 33 The NGB will block and terminate the north-south axis of Kent/Cambridge Tce, compromising the street's spatial structure and civic dimensions, as well as its historic role as an open space corridor connecting Adelaide Road and the Basin Reserve with the harbour (achievable again if and when the supermarket at the other end of the axis is removed).
- 34 The NGB will stop the register of the Basin Reserve as an open space, a public space and a publicly accessible place from Kent/Cambridge Terrace.
- 35 Together, the NGB and flyover will significantly weaken the present opportunity to enhance the amenity and liveability of Kent/Cambridge Terrace, and its potential to be transformed into an urban boulevard **[BRR\_462]**
- 36 The NGB will destroy the intrinsic structure of the Basin Reserve Cricket Ground and its carefully ordered and layered internal and external relationships. The NGB throws out of balance the symmetrical structure and weighting of the ground's building / landscape / open space relationships, extending architecture round into the domain of landscape and creating a wall which blocks the flow of north-south open space passing outside/inside the cricket ground **[BRR\_474]**

*Summary of effects*

- 37 The Proposal does not promote the sustainable management of natural and physical resources.

- 38 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.
- 39 The Proposal does not recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development, such recognition being a matter of national importance.
- 40 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; and the finite characteristics of physical resources.

### **The Basin Reserve Roundabout Enhancement Option (BREO)**

#### *Generally*

- 41 I believe NZTA's Objectives for the Project can be met by enhancing the existing Basin Reserve Roundabout. The same objectives can also be used to enhance the historic structure, unique character and sensitive environment of the Basin Reserve Historic Area.
- 42 NZTA never investigated the base case in any depth or detail throughout its many years of options' analysis, including its potential to be enhanced beyond traffic improvements. The alternative proposal, the Basin Reserve Roundabout Enhancement Option ("BRREO") does. The name "Basin Reserve Roundabout Enhancement Option" reflects this double agenda – it is both a functional enhancement of traffic movement and an enhancement of the environment of the Roundabout.
- 43 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").

44 In addition to the detailed design development of the transport plan, BRREO incorporates our practice's urban and landscape thinking for the Project. This information was left out of the documentation provided to WCC due to the terms and conditions of our contract.

### *Design*

45 Please see my Witness Concise Summary for Transport Planning (5 March 2014) for a summary of the BRREO design.

46 The aim has been to bring simplicity, consistency, legibility and cohesion to the design of the road space of the Roundabout, as well as the streets approaching it.

47 We have strengthened the axial alignment of key roads and better defined their edges and the framing of open space in-between. Kent/Cambridge Terrace, Paterson Street and Adelaide Road have benefited from this treatment and are now envisaged to be civic streets with high public amenity **[BRR\_508]**.

48 The proportions of Kent/Cambridge Tce in particular lend themselves beautifully to the creation of a fine boulevard. The walking promenade along the central median will incorporate and formalise the existing civic/commemorative monuments sited there and suggest the location of new ones. Barcelona is used as a best practice international model for this kind of arrangement. Overall, the walking promenade can become the new processional route from Parliament or the sea to Memorial Park **[BRR\_462; BRR\_533]**.

49 Our vision is for the Basin Reserve Roundabout to become the focus of the spatial hierarchy of the City Plan. Our solution enables a considerable amount of building development to occur at the Roundabout. Over the long term, this development will enable the re-imposition of the historic perimeter block definition of Sussex Square and reinforce the Roundabout as one of the major urban spaces of the city **[BRR\_505; BRR\_508]**

50 Evidence of this is already apparent with the construction of the Nuovo Apartment Complex on Rugby/Alfred St **[BRR\_511]**.

51 Retention of the existing street pattern will also sustain established businesses and stimulate new opportunities for the economic wellbeing of the city.

52 Features and properties unaffected by BRREO:

- i) Government House and entrance
- ii) C S Dempster Gateway
- iii) J Reid Gateway
- iv) Museum Stand
- v) Vance Stand
- vi) Home of Compassion Crèche (I recommend this be relocated back to its historic position to restore its relationship to the historic area and allow the opening up again of the sightlines from Cambridge Tce to Memorial Park, making this route safer and more accessible)
- vii) Access to properties along Kent/Cambridge Tce, Ellice St, Dufferin St, Rugby St, Sussex St and Adelaide Rd.
- viii) St Josephs Catholic Church
- ix) Extension of Memorial Park to Cambridge Tce (I recommend our proposal for a re-aligned pathway from Cambridge Tce to Memorial Park be adopted. The proposed pathway's straight alignment replicates the street alignment of the Te Aro Grid and replaces the old Buckle St alignment which has been removed for the Buckle St Underpass)

53 Features not needed in the BRREO to achieve the Objectives for the Project:

- i) Basin Bridge
- ii) Pedestrian and cycle bridge attached to the Basin Bridge
- iii) Northern Gateway Building
- iv) Relocation of C.S Dempster Gate
- v) New single storey commercial building on the corner of Kent Terrace and Ellice Street located partially under the Basin Bridge and a roof top planted trellis (green screen)
- vi) A new low speed link road and shared pedestrian and cycleway path from Ellice Street to the Dufferin St/Paterson St intersection
- vii) Additional carparking space on the land adjacent to St Josephs Church unless agreed with St Josephs Church and St Marks School
- viii) Relocation of the St Marks School drop-off zone according to the NZTA plan
- ix) Relocated bus stop on the corner of Rugby St/Adelaide Rd
- x) Landscaping and planting related to the Basin Bridge Project

## **Conclusion**

- 54 The Board of Inquiry decision on NZTA's application signals a profound moment in time.
- 55 The potential of this Project is 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.
- 56 Alternatively, the Project can consolidate and build upon the historic urban structure of the city with an integrated transport and land use proposal.
- 57 An alternative option submitted, the Basin Reserve Roundabout Enhancement Option (BRREO), meets the Objectives for the Project, has minimal impact, low cost and has no significant and adverse environmental effects.
- 58 Essentially, BRREO approaches the Project's Objectives with the view that transport improvements can and should build upon, extend and enhance the historic structure and unique character of the receiving environment instead of changing it fundamentally and adversely. Our practice's experience successfully re-designing similar projects has demonstrated that it is possible to achieve this without isolating the state highway from the receiving environment it passes through.
- 59 The focus on developing a holistic and integrated solution avoids the need to mitigate any harmful impacts from achieving the transport objectives. The solution also enables a significant amount of building development to occur at the Roundabout. Over the long term, both this development and our enhancements will reinforce the Basin Reserve Roundabout as a major urban space of the city. It will also maintain the Basin Reserve's Test status and I believe will improve its international reputation.
- 60 I believe the enhanced roundabout, on balance, is superior to the existing roundabout and NZTA's Basin Bridge Proposal.

**Richard Reid**

11 April 2014

**Reference source for drawings cited in this Concise Summary**

Richard Reid Evidence-in-chief : 17 December 2013

(on behalf of Mt Victoria Residents Association)

- Richard Reid - 2      **BRR\_450**\_Wellington turns on Basin Reserve Roundabout
- Richard Reid - 21    **BRR\_474**\_Basin Reserve Cricket Ground symmetrical structure
- Richard Reid - 22    **BRR\_462**\_Kent/Cambridge Tce Boulevard Perspective
- Richard Reid - 8      **BRR\_505**\_Alternative path to Memorial Park
- Richard Reid - 3      **BRR\_451**\_Wellington Landscape Setting
- Richard Reid - 12    **BRR\_508**\_Growth Spine Urban Design Improvements

Richard Reid Supplementary Evidence: 10 March 2014

(on behalf of Mt Victoria Residents Association)

- Hearing Day 22      MVRA/RRA –Supplementary Evidence Images
- BRR\_533**\_Cross Section Cambridge & Kent Tce Boulevard

Richard Reid Witness Concise Summary: 11 April 2014

(on behalf of Mt Victoria Residents Association)

- (new)                    **BRR\_001**\_Inside the Basin Reserve

Jan McCredie Rebuttal Evidence: 21 January 2014

(on behalf of Mt Victoria Residents Association)

- Appendix 1            **BRR\_511**\_Adelaide Rd Boulevard

Graeme McIndoe Rebuttal Evidence: 21 January 2014

(on behalf of WCC and BRT)

**Fig.3**\_Asymmetry of streets (page 15)

- Truescape            **Viewpoint 306a – 7B.306A.E; 7B.306A.B; 7B.306A.O**