



Submission on the Basin Reserve Bridge Proposal

This submission is made on behalf of an organisation, Mt Victoria Historical Society Inc.

The Society was incorporated in 1996. Its aims are to research and share the history of the suburb of Mt Victoria and promote interest in, and preservation of, its unique heritage.

Our submission addresses the impact on Wellington's unique heritage of the proposal to construct a flyover at the Basin Reserve. The matters are covered by Part 2 of the Resource Management Act 1991, specifically sections:

- *5(2) . . . managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being . . .*
 - *6(f) the protection of historic heritage from inappropriate subdivision, use, and development*
 - *7 . . . all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to . . .*
(aa) the ethic of stewardship
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1. Introduction

We strongly oppose construction of the flyover and the effects of the proposed mitigation structures on the historic heritage of the Basin Reserve and surrounds.

The applicant has not demonstrated why the irreplaceable historic heritage values and amenity of the wider Basin Reserve area should be so severely compromised to make way for roading. It is the view of the submitters that the adverse effects outweigh any benefits claimed in the proposal submitted to the EPA.

The Basin Reserve area has a considerable number of historic heritage places of significance at a national and/or regional level. These places include: The Basin Reserve, Canal Reserve, Government House, Kent and Cambridge Terraces, the Home of Compassion Crèche, Mount Victoria Character Area, the proposed Memorial Park, the National War Memorial, the former National Museum, the former Mount Cook Police Station and the Mount Victoria tunnel.

Decision sought: Decline consent for the structure and related applications that enable the project to be constructed.

2. We oppose the severe effects on the unique historic heritage and amenity values of the Basin Reserve

2.1 The Basin Reserve was registered by the New Zealand Historic Places Trust as an Historic Area (Register No. 7441) in 1998. The extent includes the land described as Lots 1 and 2 DP 90475 (WN58A/615 and WN58A/616), Wellington Land District and the associated buildings, structures and sites thereon, including the Museum stand (also known as the Pavillion), R.A. Vance Stand, Groundman's Shed, Playing Oval & Picket Fence, Reid & Dempster Gates, the former Midland St Pats Cricket Clubrooms, Main Fence, the Wakefield Fountain, Toilets, Scoreboard, Play Area, three Light Towers and the Bank.

An Historic Area is defined in the Historic Places Act 1993 (S.2 Interpretation) as:

“ an area of land that—

(a) contains an interrelated group of historic places; and

(b) forms part of the historical and cultural heritage of New Zealand”

The national significance of the Basin Reserve is acknowledged by all parties.

In addition, all the buildings and structures within the Historic Area are interrelated. Removal and relocation of the C.S Dempster Gate and construction of a long, three-storey structure in its place would affect the relationships between the elements of the Historic Area. The historic significance in the opposing historic entry gates on the north and south sides of the Basin Reserve, allowing entry from both sides through gates named after renowned cricketers, would be destroyed.

Decision sought: Protect the historic heritage and amenity of the Basin Reserve precinct from further adverse effects of roading proposals by either declining the application or by ensuring the application is designed to avoid actual and potential effects. We would support mitigation of the nature being undertaken to the road corridor adjacent to the National War Memorial.

3. We oppose the designation of Basin Reserve land

3.1 We oppose designation of a significant area of land from Lot 2 DP 90475, within the Basin Reserve Historic Area perimeter fence, for the purposes of the Basin Bridge Project.

The land is being taken in order to construct a building to mitigate the effect of the flyover. The proposed structure is not part of the flyover or RONS, therefore NZTA should not be permitted to take land within the registered Basin Reserve Historic Area, for the purposes of mitigation, under a resource consent to construct the

flyover. Any designation for this project should be limited to what is required for the carriageway.

Decision sought: Protect the Basin Reserve Historic Area to give effect to the intent of the Basin Reserve Trust Deed of 1884 and to its registration as an Historic Area by New Zealand Historic Places Trust.

4. We oppose the **building of a structure to ‘hide’ the flyover**

4.1 Building of the ‘mitigation structure’ is not required for construction of the flyover. The ‘mitigation’ requires removal of historic gates which are integral to the registered Historic Area and surrounds and therefore represents a severe impact on nationally significant historic heritage. The mitigation structure should be removed from this consenting process. Any construction of such a building within the Basin Reserve Historic Area should be treated separately, and not simply as mitigation for a roading project.

4.2 Building a structure simply to hide the flyover “from the critical point of view of a cricketer at the central crease”¹ ignores the impact of the flyover and ‘mitigation’ structures on all others who use or experience the Basin Reserve and its surrounds.

Decision sought: Decline consent for the structure and related applications that enable it to be constructed.

5. We oppose the irreparable destruction of the historic heritage of the Basin Reserve area

5.1 NZTA Technical Report TR12 states many times that the views to and from the Basin Reserve from north and south, and from east and west, are “historically significant” , “important historical amenities” and that these will be destroyed. It will no longer be possible to appreciate the historical setting of the Basin Reserve Historic Area as the legacy of a lagoon/swamp, nestled in a valley between hills, and at the head of a stream/swamp land that once led to the sea. The adverse effects of the proposal on the cultural landscape will not only be visible from within close proximity, but also from the surrounding hills which are valued dwelling and recreation locations.

5.2 The construction of the flyover would further erode the historic connection between the Basin Reserve, Canal Reserve and the Town Belt open spaces of Mount Victoria.

¹ Salmond, Jeremy, Basin Bridge Project: Technical Report 12: Assessment of Effects on Built Heritage, 2.3 *Summary of Effects on Heritage Values* (pg 8)

5.3 In addition, NZTA Technical Report TR12 acknowledges that the flyover “will change the setting for all heritage buildings which lie within the visual catchment”. We strongly oppose destruction of the interconnection between the historic places in this part of the city, including the Buckle Street Police Station, the Tasman Street wall, the Catholic precinct including the former St Patrick’s College and Church, the Home of Compassion Crèche, St Joseph’s, and the southern portion of the historic suburb of Mt Victoria.

Decision sought: Protect the historic heritage and amenity of the Basin Reserve precinct from further adverse effects of roading proposals by either declining the application or by ensuring the application is designed to avoid actual and potential effects. We would support mitigation of the nature being undertaken to the road corridor adjacent to the National War Memorial.

6. We oppose on the grounds of the severe impact on an historic recreation ground

6.1 The Basin Reserve has been used as a public park since 1857. It was formally granted to the citizens of Wellington by the Crown in 1861, and covered by The Town Belt and Basin Reserve Deed in 1873. This historically places it in the setting of the founding vision for Wellington, one of urban development balanced by open spaces. The 1873 Deed stated that the land was “*to be for ever hereafter used and appropriated as a public Recreation ground for the inhabitants of the City of Wellington*” and that the trustees who held it on behalf of the citizens of Wellington had no power to “*alienate or dispose of the same*”. The 1884 Basin Reserve Trust Deed, which forms part of the current Trust Deed, also states that the Basin Reserve is “*to be for ever used for the purposes of a Cricket and Recreation Ground*”.

6.2 Construction of the flyover will have a severe and irreversible effect on the nature of this open recreation space. It will impact on the way thousands of people experience it, including sports and events spectators, pedestrians and cyclists through the Basin Reserve, participants in sports and other events, those who take their lunch to the Basin Reserve on a sunny day and others.

6.3 The proposed mitigation structure adversely impacts on the recreation nature of the Historic Area by encroaching on, and further enclosing, the open space with a dominating building.

Decision sought: Protect the Basin Reserve Historic Area to give effect to the intent of the Basin Reserve Trust Deed of 1884.

7. We oppose moving of the Home of Compassion Crèche

7.1 Mt Victoria Historical Society acknowledges that relocation of the Crèche is not covered by this application. The power to move it was granted under the National War

Memorial Park (Pukeahu) Empowering Act 2012, despite the fact that its removal was not required to construct the war memorial park. Its movement was contrary to the ICOMOS² New Zealand Charter for the Conservation of Places of Cultural Heritage Value (ICOMOS New Zealand Charter 2010).

However, while NZTA has ensured that the Crèche relocation is taken out of its application to construct the Basin Reserve flyover, it does claim “siting the Crèche in close proximity to its present position, thus maintaining historical connections with the locality” and “management of heritage effects on the building in its new location”³ as part of the project.

- 7.2 Relocation of the Home of Compassion Crèche will have a severe impact on the meaning of this historic site, which will be detrimental to future understanding of its importance in the history of Wellington and the Catholic Church.

We object to the fact that the public was not consulted about the requirement to relocate the Crèche in order to construct the flyover and that the opportunity to debate this publicly in relation to construction of the flyover has been removed.

Decision sought: That the Home of Compassion Crèche remains on its original site.

8. We oppose designation of Canal Reserve land for roading

- 8.1 Construction of the proposed flyover requires the taking of land from the Canal Reserve for roading. The Canal Reserve is covered by the Town Belt Deed and subject to the Reserves Act. We object strongly to the taking of any additional Town Belt land, which is held in trust for the citizens of Wellington for the purposes of recreation.

Decision sought: Protect the historic heritage values, to give effect to the intent of the Town Belt Deed for the Canal Reserve area, from the adverse effects of the proposal by either declining the application or by ensuring the application is designed to avoid actual and potential effects. We would support mitigation of the nature being undertaken to the road corridor adjacent to the National War Memorial.

9. We oppose construction of the flyover because of its impact on southern Mt Victoria

- 9.1 NZTA Technical Report TR12 includes among its assessment of adverse effects of the flyover construction, the impact on the setting of the Mount Victoria Residential Character Area.

Mount Victoria is an historic suburb retaining a large amount of its original housing. The southern edge of Mt Victoria is defined by Paterson Street, Kent Terrace, Ellice Street and Dufferin Street.

² International Convention on Monuments and Sites

³ Basin Bridge Project Technical Report 12: Assessment of Effects on Built Heritage, pages vii and 12

9.2 We are particularly concerned at the impact on lower Ellice Street. The application includes permission to remove 28 Ellice Street and take additional land from St Joseph's property in order to build the flyover closer to the church and residences on lower Ellice Street. This will have a severe impact on 21-45 Ellice Street and 28, 32, 40 Ellice Street. These buildings, along with 9-13 Dufferin Street, are acknowledged by NZTA Technical Report 12 as having heritage significance⁴.

This adds to the impacts on historic heritage of the Basin Reserve area that have already been incurred by the removal of the historic buildings on Bogart's Corner by NZTA management. These effects are cumulative and adverse on the historic setting of the Basin Reserve.

9.3 We oppose removal of the pre-1900 residence at 28 Ellice Street, which constitutes destruction of the last remaining residence on the south side at the bottom of Ellice Street.

9.4 Degradation of the environment through removal of 28 Ellice Street and proximity of the flyover with its associated traffic noise, vibration, dirt and lighting will severely impact historic houses in lower Ellice Street. It is likely to lead to further loss of heritage buildings in this area in future.

9.5 We also object to the severe impact on St Joseph's Church, a highly regarded example of modern ecclesiastical architecture, which is likely to one day be regarded as an important part of the city's architectural heritage. This award-winning, eye-catching building by Studio Pacific Architecture includes an important stained glass window by renowned New Zealand artist, Shane Cotton. The brief for the church design in 2001 was "to create a new church and community facility on a prominent site in Wellington" and a building that is "simple and modest, worthy of the people of God. The beauty of the building should derive from its material and form rather than from its ornamentation."⁵

If this project is approved, the church would almost directly abut the flyover/pedestrian bridge, which will in turn destroy its prominent setting.

Decision sought: Protect the historic heritage and amenity of the Mt Victoria Character Area from further adverse effects of the proposal by either declining the application or by ensuring the application is designed to avoid actual and potential effects. We would support mitigation of the nature being undertaken to the road corridor adjacent to the National War Memorial.

⁴ Basin Bridge Project Technical Report 12: Assessment of Effects on Built Heritage, page 13

⁵ http://www.stjosephs.org.nz/www.thecarpenterproject.co.nz/about_the_project.shtml, accessed on 1.9.2013