

David Sylvester
National Planning Manager
Transit NZ
P O Box 5084
Wellington

6 October 2003

Dear David,

Re: Review Panel for Selected Proposals for Transit NZ Funding

We understand that the Wellington Inner City Bypass is one of the projects selected for consideration by the proposed Review Commission, soon to be established by Transit New Zealand. The Wellington Civic Trust is very pleased to have this opportunity to put before the Review Commission our concerns regarding the inner-city bypass and indeed, any motorways which dissect major urban areas.

The Civic Trust has been monitoring the development of the inner-city bypass proposal since its inception, noting the issues raised as it passed through the various stages of approval. The Transport Subcommittee of the Trust has also had discussions with officers of the Wellington City Council and Greater Wellington concerning the overall effects of the bypass as it is currently planned.

The matter that for us has been highlighted by this process is the criteria used by Transit New Zealand in its cost-benefit analysis to determine eligibility for funding. In the case of Wellington's Inner City Bypass, major cost reductions had to be made in order that the project be eligible, including a change from the original trenched design to the present at-grade design. Our assessment is that while the criteria used may be practicable and reasonable for roading projects in rural areas, they have significant deficiencies when applied in an urban context.

In an urban context a number of social and environmental issues become very important. In the case of a major road through a city area, social impacts such as noise, pollution, severance and urban decay become at least as important as traffic flow and construction cost considerations. Such factors should be included in the cost-benefit equation.

We accept that these are sometimes difficult to attribute monetary value to and, to a degree are subjective – but surely they are no more subjective than the value attributed to a human life within the current cost-benefit criteria used for decision-making by Transit NZ! The Trust therefore believes that Transit New Zealand should develop a separate set of criteria for evaluating urban roading proposals that give greater weighting to social and environmental effects.

It could be argued that the resource consent process is the appropriate forum to address these issues. However, the Trust believes (based on its experience of these processes both at the local authority and Environment Court levels) that the RMA process does not adequately provide for an holistic approach to the protection of urban life-quality values.

The Trust believes therefore that the following matters need to be included in the criteria used by Transit NZ to evaluate the costs and benefits of roading proposals in major urban settings.

- a. The impact on the overall character and functioning of the area the road passes through.
- b. Whether there are buildings, structures and sites that should be given special consideration and the cost of providing for that (in the case of the inner-city bypass, the National War Memorial would be such a structure).
- c. The impact of severance on the functioning and environmental quality of the area that would be separated from the central city – including the experience of pedestrians moving between the two areas.
- d. The impacts on services and facilities such as public transport and parking.
- e. The economic impacts on businesses in the local area – rather than the region.
- f. Impacts on residents in terms of noise, pollution and severance. This factor is particularly important in the Wellington case given the rapid development of residential accommodation in the Te Aro area.

We believe that had these factors been included in the cost-benefit analysis of the Inner City bypass, a trenched motorway would have been more likely to receive approval for funding from Transit NZ than the current at-grade proposal. We believe the current proposal will impose costs on the built environment of the city that will far outweigh the traffic benefits gained.

Di Buchan
Chairperson.

cc. Steve Harte, Wellington City Council
Chair, Greater Wellington