

New Plymouth District Council
[via email]

25 August 2020

Attention: District Plan Team

Further Submission by Urban Aspect Ltd

Urban Aspect Ltd received notice on 7 August 202 that a submission has been received requesting the interior of 'CC Wards' (specifically 6 Devon Street East) be listed in Sched 2 (Interior Elements).

Please find attached a further submission on behalf of Urban Aspect Ltd. Please contact me if you wish to discuss the contents of this further submission in any capacity.

Yours sincerely



Hywel Edwards
Branch Manager - New Plymouth

on behalf of

Beca Limited

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Shane Burwell, Urban Aspect Ltd

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON NPDC'S NOTIFIED PROPOSED DISTRICT PLAN

Clause 8 of Schedule 1 Resource Management Act 1991

To: New Plymouth District Council
Address: Private Bag 2025, New Plymouth 4342
Email: districtplan@npdc.govt.nz

Further Submitter Details

Name of further submitter: Urban Aspect Ltd
Contact person: C/- Hywel Edwards
Postal address: Beca Ltd, Level 1/54 Gill Street, New Plymouth 4340
Email address for service: Hywel.Edwards@beca.com
Phone number: 027 463 3031

I am: *(please tick relevant box)*

- a) A person representing a relevant aspect of the public interest.
(In this case, also specify the grounds for saying that you come within this category); or
- b) A person who has an interest in the proposal that is greater than the interest of the general public.
(In this case, also explain the grounds for saying that you come within this category); or
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

Urban Aspect Ltd is the owner of the property, the interior of which a third-party submitter has sought to be listed.

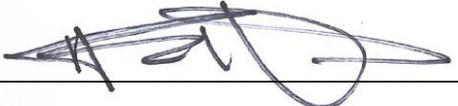
Council Hearing *(please tick relevant box)*

Do you wish to be heard in support of your further submission? Yes No

If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes No

Submission

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

Signed: 

Date 25 August 2020

Original Submitter	Part of the Submission		Reason for Support / Opposition	Relief Sought
	Sub No	Support/Oppose	Plan Prov	
Hamish Crimp	317.10	Oppose	<p>SCHED2 - Schedule of Heritage Buildings (Interior)</p>	Disallow
			<p>The submitter has sought a review be undertaken to identify other significant interiors within New Plymouth District. The submitter seeks that the interior of the C. C. Ward's building (specifically 6 Devon Street East) in New Plymouth should be considered for scheduling.</p> <p>Reason for Opposition:</p> <ul style="list-style-type: none"> ■ The submission itself does not seek for the interior of CC Wards (6 Devon Street East) to be included in Schedule 2. Rather, it seeks that the listing be 'considered' for scheduling (presumably by New Plymouth District Council). That being the case, no submission has actually been lodged seeking that the interior of 6 Devon Street East be included within Schedule 2 as part of the current District Plan Review process. ■ There is no evidence base for listing the interior of 6 Devon Street East, nor any clarity on what is sought to be listed. ■ The interior of 6 Devon Street East has been significantly modified since a conservation plan was prepared in 2003 (for guidance purposes). Many of the features identified in the 2003 conservation plan have been either altered or removed (not by the current owner). ■ 6 Devon Street East has been determined a seismic risk, and has subsequently remained vacant for a number of years. Any future listing of the interior of the building will significantly compromise the ability for the building (and also 47 Currie Street) to be seismically strengthened and brought back into functioning use. Any future listing will compromise the long-term viability of the building. <p>It should also be noted that the since purchasing the property, Urban Aspect Ltd has investigated seismic strengthening of the CC Wards building complex (including 6 Devon Street East and 47 Currie Street). The owner has engaged a range of specialists (engineers, architects, planners and heritage experts) at considerable expense, with a view to strengthening the buildings and bringing them back into use. Pre-application consultation with Council, in respect of preparing and lodging a resource consent to strengthen and bring the buildings back into functional use, have included retaining some internal features associated with 6 Devon Street East.</p> <p>Listing the interior of 6 Devon Street East will add significant cost, complexity and uncertainty to any future resource consent process, with the likely outcome being that the process would not be advanced and the building remain structurally unsound, vacant and left to deteriorate further.</p>	