



When replying please quote document no: LUC20/47704

21 October 2020

KD HOLDINGS LTD
C/- BTW Company Limited
PO Box 551
NEW PLYMOUTH 4340

Attention: Cam Twigley & Darelle Martin

Dear Darelle and Cam

RESOURCE CONSENT APPLICATION (LUC20/47704) – FURTHER INFORMATION KD HOLDINGS LTD – 49 BROUGHAM STREET, NEW PLYMOUTH

Application number: LUC20/47704

Applicant name: KD HOLDINGS LTD

Address: 45, 49 and 51 Brougham Street and 33 Devon Street West, New Plymouth.

Activity Description: Construction of a six-storey mixed use building with a basement car park at the site described above. Levels 1 to 5 are proposed to be for commercial tenancies and the top floor is to consist of a three bedroom residential apartment. To facilitate the proposal it is required to relocate the Halamoana sculpture and remove a notable tree.

I am requesting further information to better understand your proposal's effect on the environment and the ways any adverse effects might be mitigated. The information requested below responds to matters raised during the submissions process that have not been sufficiently considered within the AEE or supporting documents and is required to assist in Council making a recommendation to grant or decline the application prior to a hearing.

Requested information

1. **Function of Basement Parking Area** – Parking is not required within the CBD Zone, however if parking is proposed, such as in this case, Council must be confident that the proposed parking layout and dimensions will work and therefore not have any adverse traffic safety effects within the parking area or any effects that may flow out onto the road due to the internal parking are not functioning. Therefore we request the following further information;
 - Illustrate tracking curves for manoeuvring; and
 - Confirmation that the parking dimensions are in accordance with AS/NZS 2890.1:2004.

Note

The application states compliance with AS/NZS 2890.1:2004 is achieved however stall depth appears to be inadequate. If not amended it would be beneficial to demonstrate that the lack of

stall depth won't impact on the efficiency of the parking and potential for cars to queue back on to Brougham St.

2. **Life Expectancy of Notable Tree** – It is noted that all four of the submissions in opposition received made comment against the removal of the notable tree. Council's arborist Josh Paice has reviewed the Asplundh Arboricultural Assessment provided with the application. Josh Paice agrees with the findings of the report with exception to the "best estimate of useful future lifespan" of 20 years. Reasoning as to this 20 year estimate is provided in the report, however the reasoning provided is limited. Please give further consideration to the life expectancy estimate of 20 years and if confident that the lifespan of the tree is to be approximately 20 years please provide more detailed validation against this assumption.

3. **Effects on Heritage Character Area** – Despite a majority of the site and building not being located within the Heritage Character Area (HCA) the site is partially subject to the HCA where the works overspill into the Council owned land to the east. This land is subject to the HCA. Further, the properties to the north and west (across of Brougham Street) are all within the HCA and there are four heritage buildings within close proximity to the site including H-133, H-110 and H-31. Three of the four submissions received in opposition raised concerns that the building will be out of character with the HCA, will overwhelm surrounding Heritage Buildings and that the building is not consistent with the [City and Town Centre Design Guide](#). Currently the AEE and LVIA provided to Council touches on effects on Heritage Character, however to better understand the effects of the proposal on the HCA greater consideration is required and therefore we request the following:
 - Please make a specific assessment of the proposals effects on the HCA.
 - Please make an assessment of the proposal against the relevant parts of the City and Town Centre Design Guide;
 - With respect to the Design Guide please considered the effects on the heritage buildings within the area (H-133, H-110 and H-31) and whether the proposal will overwhelm and / or have adverse effects on the heritage character and amenity values associated with those buildings; and
 - Please provide a statement from a suitably qualified person regarding the effects of the building on the HCA.

Please feel free to contact me on 06-759 6060 and quote the application number above, if you wish to discuss your application further.

Yours sincerely



Luke Balchin
Environmental Planner