

From: Stevens, Chessa [<mailto:chessa.stevens@wsp.com>]
Sent: Thursday, 11 June 2020 1:57 PM
To: Peter Daly
Cc: Moira Smith
Subject: SR 464277 - 114 Adelaide Road - RFI review

Kia ora Peter,

I have reviewed the information relating to the Resource Consent Application for the proposed demolition of the Tramway Hotel, 114 Adelaide Road, being the following documents:

- Application for Resource Consent prepared by Ian Leary for Spencer Holmes Ltd, May 2020
- Certificate of Title
- Assessment of Environmental Effects, Former Tramway Hotel, 114 Adelaide Road, Wellington, prepared by Ian Bowman, May 2020
- Seismic Capacity and Strengthening Review for Tramway Hotel at 114 Adelaide Road, Wellington prepared for IPG Corporation Ltd by Silvester Clark, April 2020
- 114 Adelaide Road Concept Restrengthening Estimate prepared for IPG Corporation Ltd by Maltbys, March 2020
- Letter from Colliers International to Lakhi Maa Ltd "Market valuation – as if complete, 114 Adelaide Road, Mount Cook, Wellington" dated 28 April 2020
- Built Heritage Incentive Fund Past Allocations 28 February 2019 Round
- Email from Stephanie Steadman (WCC) to Denis Parbhu (Lakhi Maa Ltd) dated 13 September 2019
- Letter from Meredith Connell to Lakhi Maa Ltd "Notice of Intention to seek orders under s 133AS of the Building Act" dated 29 November 2019
- Originating application for orders under section 133AS of the Building Act 2004, dated December 2019

Ahead of making my final assessment of the application against the objectives, policies and rules for Heritage in the Wellington City District Plan, it would be useful to have further information as follows:

1. To establish whether or not every reasonable alternative solution has been considered to minimise the effect on heritage values (21A.2.1.8) and policy 20.2.1.2:
 - a. Was the Seismic Capacity and Strengthening Review independently peer reviewed? If so, can the applicant please provide this.
 - b. Were any alternative strengthening schemes considered (at any stage) for comparison to Silvester Clark's recommendations? If so, what are these, and where is the evidence?
2. Was the Concept Restrengthening Estimate on which the applicant relies independently peer reviewed? If yes, can the applicant please provide this.
The application relies heavily on the cost of the strengthening, and the comparison with market value of the building. I note that there are a number of ways to consider the feasibility of developments and am concerned that the applicant's methodology is incomplete and inconclusive. Do you think that the applicant should be given the opportunity to provide a more conclusive report that includes other methods of considering feasibility?
3. The application states that funding organisations have been approached for loans, and the availability of grants has been considered. Can the applicant provide evidence of these enquiries (beyond stating that the WCC BHIF has previously granted amounts that the applicant believes are too small to be of use to them)? For example, Heritage EQUIP.

My current views on the application are:

1. Demolition will result in significant adverse effects and cannot be supported under any of the relevant assessment criteria of rule 21A.2.1, or by the heritage objectives and policies in the District Plan.

2. The building has high heritage significance at a local and regional level – ie, more than the medium significance that Ian Bowman has given in his report – based on the WCC assessment criteria which are the ones most relevant in this case.
Taken together, the high (rather than medium) heritage value of the building and the major adverse effect of demolition means that the significance of the effects is more than the moderate/large rating that Ian has given
3. In any case, Ian's AEE does not support demolition.
 - a. It clearly states that the demolition will have major adverse effects in relation to all of the assessment criteria (both WCC and HNZPT). He also notes that the effects are permanent and irreversible.
 - b. It also states that Ian has previously assessed the option for adding four floors to the building, but that he is not aware of other options that could be explored. This does not mean that there are no other options, it just means that there are none that Ian Bowman is aware of – and, by virtue of being unaware of other options, he is avoiding making a comparison or having to justify the demolition under 21A.2.1.8.
4. There is an absence of evidence that other reasonable alternative solutions have been appropriately considered, and the reasons why they have not been adopted.
5. While the scheme proposed by Silvester Clark would result in loss of heritage fabric, it would not result in complete loss of the building, and I am not convinced that the loss of heritage fabric that would result from strengthening would be such that it would reduce the building's overall heritage significance so substantially that demolition is justified.
6. Alternative solutions that would be acceptable from a heritage perspective have been provided to the applicant (and included in the application) – and I note that the comment on p11 of the application “ WCC Heritage advisers have indicated that they would not support additions and alterations to the building” is not true, as evidenced by the email from Stephanie Steadman which is included in the application. WCC heritage advisors have indicated that they could support an addition of up to three-storeys from ground level at the rear of the building, subject to design & AEE. The applicant may be able to find a heritage expert that would support a larger addition.
7. The cost argument relies on the difference between the estimate for the strengthening scheme proposed by Silvester Clark (without any building additions) and the value of the building. Even if these figures are to be accepted without question, it does not mean that the building owner would not be making reasonable economic use of the building. The applicant is conflating the cost difference between strengthening and value with the return that could be generated by using the building once it is strengthened. My view is that there are ways to strengthen this building so that the owner can make a reasonable economic use of it, but that haven't been investigated by the applicant. Feasibility is generally considered to be beyond the expertise for most heritage advisors, so do you think it would be reasonable for Council to commission expert advice on feasibility?

I'm not in the office tomorrow (Friday 12th) so I won't be available until Monday, but hopefully the above is sufficient at this stage for an RFI.

If you could give me an indication of when you will need my final report, that would be great.

Cheers,

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