BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 29 to the Nelson Resource Management Plan

---

STATEMENT OF REPLY OF CAM WALLACE (URBAN DESIGN)

Dated 14 October 2024

---

1. INTRODUCTION

1.1 My full name is Cameron Wallace and I am a Partner and Urban Designer at Barker & Associates ("B&A").

1.2 My qualifications and experience are set out in Paragraphs 1.2 to 1.5 of my evidence-in-chief ("EiC").

1.3 The purpose of this document is to respond to specific matters raised by submitters in evidence as part of the hearings for PC29. Specifically, the evidence of:

(a) Mr Steve Webster (Submitter 453); and
(b) Mr Brendon Liggett on behalf of Kaingā Ora (Submitter 933).

2. SHADING IMPACTS FROM INTENSIFICATION

1.1 I have viewed the presentation material provided by My Steve Webster. The 2D cross-sections provided by Mr Webster generally present a fair theoretical representation of a worst-case scenario under the existing and notified rules. However, I have identified some minor errors in Mr Webster's shading cross-sections but note that these may have been prepared in advance of the revised provisions presented in the s42A report. These include:

(a) It utilises a 12m height limit across the full extent of a hypothetical MDRZ site rather than as a gable protruding through the 11m height limit; and
(b) It does not factor in the revised position of a 4m + 35^0 which would apply to the rear boundary of sites in the MDRZ.

1.2 When understanding shading impacts, it is important to recognise that shading is something that is experienced in 3D across a full site. Shading is a dynamic process which changes throughout the day and year based on a wide range of factors related to solar angles and azimuth, surrounding topography as well as the existence of deciduous or evergreen vegetation. I note that Mr Webster partially addressed this during the video's provided as part of his presentation.

1.3 The 2D cross-sections provided by Mr Webster (by their very nature) are not able to incorporate other standards which would impact on the amount of shading generated such as building coverage and maximum building length. Other standards or real-world situations including the configuration of outlook spaces, private outdoor space, vehicle access/ on-site manoeuvring or the provision of car parking would invariably impact the extent of shading that any given development could generate due to increased setbacks. It is not clear if any of these factors were able to be incorporated into Mr Webster's models. However, I note that they appear to indicate a simple extrusion along the length of any given site which is not permitted under the package of standards proposed within the MDRZ or HAO.

1.4 Figures 1 and 2 below provides an example of theoretical shading generated over the course of a day (22 June and 22 September) on a 20m wide site[1] from the MDRZ provisions as proposed within the s42A report (with north pointing towards the right of the page and assuming two adjacent sites both redevelop to the maximum extent). This modelling utilises the same model that was demonstrated in Figure 3 of my Evidence in Chief and shows how areas immediately south receive varying degrees of shadow and sunlight throughout the day as the sun tracks across the sky (but excludes the impact of fencing and trees etc).

[1] As sites get narrower, the ability to construct a viable third storey up to the 11m height limit reduces. As a rule of thumb of floorplate depth of around 8m is generally considered as narrow as could be expected in medium or high-density typologies. These would require a site width of at least 16m to deliver in the MDRZ.

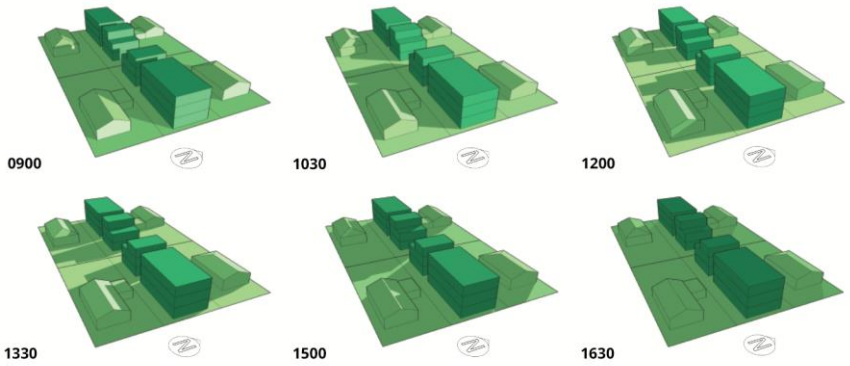


Figure 1 - MDRZ Theoretical Shading on 22 June

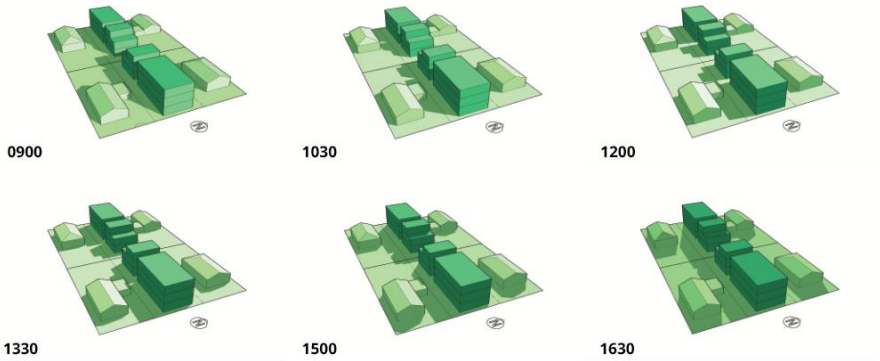


Figure 2 - MDRZ Theoretical Shading on 22 September

2.1 As is demonstrated in the Figure above, the proposed MDRZ (and HAO) provisions will generate increased levels of shading on adjoining properties – especially those located directly south. However, they also demonstrate the types of building forms common in medium density areas could still be accommodated within the theoretical building envelopes enabled. In contrast, the ability to deliver two-storeys, let alone three-storey development is heavily constrained by the operative daylight recession planes in combination with the underlying cadastral pattern of Nelson which features a number of blocks which run in an east-west direction. I have addressed this matter for both the MDRZ and HAO specifically in paragraphs 5.41 to 5.52 of my Evidence in Chief.

3. **MDRZ Spatial Extent around Stoke**

3.1 Appendix 2 of the evidence of Mr Brendon Liggett on behalf of Kāinga Ora identifies two blocks of land south-east of the Stoke Town Centre that were within the notified extent of the MDRZ and removed as part of the s42A report. Mr Liggett seeks that these two blocks be reinstated as MDRZ.

3.2 I addressed the zoning of adjacent land in Stoke within Paragraph 5.14 of my Evidence in Chief. In my opinion, similar justification for retaining these within the MDRZ applies. These blocks of land sit at the fringe of the more accessible areas but have the ability to be comprehensively redeveloped owing to the concentrated landholdings of Kāinga Ora. Whilst the two blocks are identified as having lower relative accessibility, I note that they are still located within 400m of a primary school and 400m of sports fields and other reserves, while the northernmost block is also located within 800m of both the Stoke Town Centre and New World Supermarket.

Cameron Wallace
14 October 2024