

BEFORE THE HUTT CITY COUNCIL

Independent Hearing Commissioner(s)

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Lower Hutt District Plan

REPLY STATEMENT OF MIRIAM ADEANE MOORE

Associate Principal Urban Designer

2 October 2026

1.0 RESPONSE TO PANEL QUESTIONS

- 1.1 The Panel has sought further comment on Paula Clarke's evidence on behalf of Go Architecture regarding the application of Standards MRZ-S10 and HRZ-S10, and in particular the meaning of residential units "facing the street". Ms Clarke's speaking notes gave examples of hill suburbs where although the site is fronting the street, the dwelling is positioned well below the street level, she also gave the examples of rear sites with no street frontage.
- 1.2 I understand Ms Clarke's concern to be that, where a residential unit or its façade does not have a meaningful visual relationship with the street, application of the glazing standard would not achieve the intended urban design outcome.
- 1.3 From an urban design perspective, the purpose of the glazing requirement is to support an active interface between residential development and the street, including by providing opportunities for visual connection between the residential unit and the public realm. On this basis, I agree that there would be limited urban design benefit in requiring the minimum glazing standard to apply to a façade that, because of the topography, location or configuration of the site is not visible from the street and does not have a direct visual relationship with it.
- 1.4 For further clarification, I consider that the relevant consideration should not be the street address of the site. A site may adjoin more than one street, or a residential unit may be located on a rear site while having a boundary and direct visual relationship with a street other than the street from which the site is addressed or accessed. In those circumstances, the urban design purpose of the standard would still be relevant. I therefore consider that any façade of a residential unit adjoining and having a direct visual relationship with a street should be considered, irrespective of the formal street address or primary vehicle access to the site. Where there is no boundary to any street, other than by right of way, I do not consider

there to be any relationship between a residential unit and the street that requires application of this Standard.

1.5 To summarise, I support an amendment to Standards MRZ-S10 and HRZ-S10 that links application of the standard to both:

- a. the residential unit being located on a site with a boundary adjoining the street; and
- b. the relevant façade having a direct visual relationship with that street.

1.6 This would address the circumstances identified by Paula Clarke and the Panel, including dwellings substantially above or below street level, while retaining the standard where glazing has the potential to contribute meaningfully to the activation and passive surveillance of the street.

1.7 I would support the following amendment

New ~~R~~esidential units and additions to existing residential units facing the street must have a minimum of 20% of the street-facing façade in glazing, where the residential unit has a boundary with the street and the street-facing façade is visible from the street. This can be in the form of windows or doors.

MIRIAM ADEANE MOORE

Associate Principal Urban Designer

Boffa Miskell Limited

2 October 2026

