

**BEFORE THE INDEPENDENT HEARINGS PANEL
OF HUTT CITY COUNCIL**

UNDER the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER of the Proposed Hutt City District Plan ("**Proposed Plan**")

**STATEMENT OF EVIDENCE OF ANGELA JOY GOODWIN
ON BEHALF OF WASTE MANAGEMENT NZ LIMITED
(HEARING STREAM #5 NATURAL HAZARDS)**

PLANNING

5 AUGUST 2026

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Executive summary

1. This statement of evidence addresses Waste Management NZ Limited's ("**WM**") submission points on the Natural Hazard provisions of the Proposed Plan. I have reviewed the Section 42A report prepared by Mr Stephen Davis ("**Section 42A Report**").
2. WM's evidence relates primarily to the natural hazard overlays applied to 30 Benmore Crescent, Manor Park. The amendments sought by WM are intended to ensure that the overlays accurately reflect hazards that are present on the site. WM has lodged resource consents to establish and operate a resource recovery park on part of the site.
3. In summary, I support the following relief sought by WM specific to 30 Benmore Crescent, relevant to matters assessed in the Section 42A Report:
 - (a) Amendments to the natural hazard overlays to:
 - (i) amend the spatial extent of the flood hazard overlay to reflect the updated modelling undertaken by Mr Philip Wallace of River Edge Consulting; and
 - (ii) amend the Fault Location Area overlay.
4. I do not make a recommendation on whether plan provisions should be based on Representative Concentration Pathway ("**RCP**") 8.5 (as used in the Proposed Plan) or RCP 4.5 (as recommended in the Section 42A Report).¹ However, I note that the updated flood modelling assessment is based on RCP 8.5 meaning the results can be used accurately for mapping regardless of the scenario adopted by Hutt City Council.² This is because RCP 8.5 assumes materially higher rainfall intensities than RCP 4.5, so that flood hazard extents derived using RCP 8.5 assumptions represent a conservative, worst-case outcome relative to RCP 4.5.

Introduction

5. My full name is Angela Joy Goodwin. I have previously prepared statements of evidence on behalf of WM relating to its submission on matters addressed

¹ RCP 4.5 and 8.5 are different climate change scenarios with 8.5 assuming a higher degree of temperature change and therefore rainfall.

² Statement of Evidence of Philip Lawrence Wallace dated 5 August 2026 at [16].

in Hearing Stream #1 (Opening), #2 (Business), and #3 (Rural) of the Proposed Plan.

6. My qualifications and experience as a planning expert are set out in paragraphs 6 – 10 of my statement of evidence for Hearing Stream #1 (Opening) dated 13 April 2026.

Code of conduct

7. I repeat the confirmation given at paragraph 11 of my statement of evidence for Hearing Stream #1 (Opening) dated 13 April 2026 that I have read the Expert Witness Code of Conduct and agree to comply with it.

Scope of evidence

8. I have been engaged by WM to present planning evidence in relation to the matters addressed in Hearing Stream #5 (Natural Hazards) of the Proposed Plan. Specifically, this statement of evidence will:
 - (a) explain the changes sought to the spatial extent of the flood hazard over 30 Benmore Crescent shown on Proposed Plan maps, based on updated modelling undertaken; and
 - (b) clarify WM's position on the Fault Location Area and associated provisions within the Proposed Plan.

Flood Hazard Area

9. The flood hazard maps in the Proposed Plan show a flood hazard over a large portion of 30 Benmore Crescent. However, the current Proposed Plan flood overlay is based on modelling that does not account for the significant earthworks authorised by a recent resource consent that have commenced on the site.³ The maps no longer match the results of the site-specific model completed at the time of the earthworks application for resource consent, undertaken in 2022 by Mr Philip Wallace of River Edge Consulting.

³ This is authorised by HCC consent number RM220258.

10. The Section 42A Report discusses differences in assumptions informing the modelling undertaken by Tiaki Wai for Hutt City Council and the report prepared for the site by Mr Philip Wallace of River Edge Consulting.⁴ The key differences are:
- (a) Both models adopt the climate change scenario of RCP 8.5. However, the River Edge Consulting Report 2022 model uses a planning horizon of 2080-2100 (which was acceptable at the time it was prepared) and the Tiaki Wai model uses a horizon of 2130. As a result of the longer horizon, the Tiaki Wai model assumes greater rainfall.
 - (b) The River Edge Consulting Report 2022 model considers recent earthworks undertaken and to be complete on the site. The Tiaki Wai report does not materially consider the altered ground levels created by these works.
 - (c) The River Edge Consulting Report 2022 assumes higher concurrent flows in the Hutt River than the Tiaki Wai report.
 - (d) Both models assume different catchment boundaries.
11. With the Section 42A Report, Mr Davis recommends that a low flood hazard overlay (with the exception of the stream corridor for Benmore Stream) apply to the site until such time as either:
- (a) the Tiaki Wai model is updated to reflect the levels created by the earthworks; or
 - (b) the independent modelling is updated to include the higher rainfall (ie applying a planning horizon of 2130), and adjacent catchments.
12. As set out in the statement of evidence of Mr Wallace, the independent modelling has been updated to reflect higher rainfall with a planning horizon of 2130.⁵ As a result, the model is now comparable to the Tiaki Wai model in respect of the higher rainfall modelling and also includes the finished contours that result from the recent changes to the ground level at the site caused by the earthworks.
13. The results of the updated modelling set out by Mr Wallace demonstrate the spatial extent of flood hazards under the assumptions used in the model is less

⁴ Section 42A Report at [22.84].

⁵ Statement of Evidence of Philip Lawrence Wallace dated 5 August 2026 at [14(a)].

than that shown on the Proposed Plan maps. I adopt the opinions of Mr Wallace and consider the low flood hazard overlay recommended by the reporting planner is now unnecessary. The findings of the model support WM's submission that the flood hazard overlay over 30 Benmore Crescent should be amended to accurately reflect flood hazards on the site.

14. As reflected in the Section 42A Report and shown by the updated model output appended to the statement of evidence of Mr Wallace, parts of Dry Creek⁶ and banks of the Hutt River in the vicinity of the site remain subject to flooding. I consider it is appropriate that the Proposed Plan map overlays include these areas.

Site-specific fault line location provisions

15. The submission of Te Kārearea Ltd and Rosco Ice Cream Ltd opposes the proposed general rural zoning and submits that the zoning of 30 Benmore Crescent should be general industrial with "site-specific provisions", including site-specific fault line location provisions.⁷
16. There are two issues with regard to the fault location area that extends through the site:
 - (a) the spatial definition of the fault location area in the overlay maps; and
 - (b) whether provisions specific to 30 Benmore Crescent within the fault location area are necessary.
17. The reporting planner recommends retaining maps as notified in this regard.⁸ The presence of the fault through the site is not at issue. Nor is the need to regulate development in proximity to the fault.
18. The further submission of WM supports this submission point of Te Karearea Ltd.⁹ WM's further submission point considers the Fault Location Area that runs through 30 Benmore Crescent should be based on recent, site-specific investigations. The statement of evidence of David Gibson for Te Kārearea Ltd outlines that Tonkin and Taylor undertook a site-specific investigation of

⁶ Referred to as Benmore Stream in the Section 42A Report.

⁷ Submission 447 Te Karearea and Rosco Ice Cream Ltd dated 2 May 2025 at [6.1].

⁸ Section 42A Report at [904].

⁹ Submission point 447.6.1(b) and Further Submission Point F39.14.

the location of the faultline.¹⁰ I consider the map contained in Appendix 1 of that report should be used to determine the location and width of the Faultline Location Area in respect of 30 Benmore Crescent.

19. The reporting planner does not consider site-specific fault line location provisions to be necessary and that the provisions as drafted for the overlay are sufficient. With reference to the submission of Te Kārearea Ltd, my understanding is that Te Kārearea Ltd intended the submission to seek general industrial zoning with the specific provisions and overlays listed in the submission. The intent was for the fault location area provisions to apply in addition to the industrial zone provisions requested by that submission. My understanding of Te Karearea Ltd's submission is that they seek an up to date definition of the fault location area through 30 Benmore Crescent (as set out above) but support the provisions of the overlay as drafted applying to the site.
20. I agree with the reporting planner that site specific provisions to regulate use and development in proximity to the fault are not necessary. In relation to the spatial definition of the fault location area, I consider this should reflect the site-specific information that is available.

Angela Goodwin
5 August 2026

¹⁰ “Te Rangiheata / Manor Park Development Wellington Fault Investigation Report” dated 7 July 2021. This report was submitted for the earthworks consent for the site that was approved by HCC under RM220258.