

BEFORE THE INDEPENDENT HEARING PANEL  
APPOINTED BY HUTT CITY COUNCIL

**IN THE MATTER**

of the Resource  
Management Act 1991

AND

**IN THE MATTER**

of Submission 516 of the  
Proposed District Plan:  
104 Upper Fitzherbert Road,  
Wainuiomata - Rezoning to  
Medium Density Residential  
Activity Area

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**STATEMENT OF EVIDENCE OF SAMUEL ROBERT GODWIN**

**CIVIL ENGINEER**

**26th MAY 2026**

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# **1 INTRODUCTION**

- (1) My full name is Samuel Robert Godwin

## **1.1 Qualification and Experience**

- (2) Chartered Professional Engineer (Civil)
- (3) Chartered Member of Engineering NZ
- (4) Bachelor of Engineering with Honours (Canterbury)
- (5) Director of Cuttriss Consultants Ltd
- (6) Nine years of experience in land development and civil engineering
- (7) I have been involved in a number of residential land development projects in Wainuiomata and the wider Hutt Valley. Relevant local experience includes 221 and 239 Wise Street, the Wise Street road extension, 246 Wise Street and 120 Upper Fitzherbert Road. That experience has informed my understanding of the local roading network, three waters servicing environment and the practical development issues in the immediate area of 104 Upper Fitzherbert Road.

## **1.2 Code of Conduct**

- (8) I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

# **2 Scope of Evidence**

- (9) I have prepared this evidence at the request of Urban Plus Limited, who are acting on behalf of FH Developments 2025 Ltd. My evidence addresses the civil engineering and infrastructure servicing matters relevant to the proposed rezoning of 104 Upper Fitzherbert Road, Wainuiomata to Medium Density Residential Zone. In summary, my evidence considers whether there is a feasible engineering pathway to service future residential development of the site if rezoning is approved.
- (10) The current Cuttriss Consultants Limited sketch plan, drawing 31085 SK1, shows a potential subdivision layout yielding 72 lots. The layout is indicative rather than a detailed resource consent design. For the purposes of this evidence, I have assessed the servicing feasibility of

an indicative yield range of approximately 70 to 100 residential lots. The final yield will be confirmed through future resource consent design.

- (11) My assessment is that there is a feasible servicing pathway for future residential development of the site through a combination of existing infrastructure, planned network upgrades, site-specific mitigation, and detailed design. The detail of those solutions would be confirmed through any subsequent subdivision or land use consent process and associated engineering approvals.
- (12) I have also considered the relevant notified provisions of the Proposed District Plan, including the Three Waters and Subdivision chapters, insofar as they relate to infrastructure servicing for future development. In my opinion, the servicing approach outlined in my evidence is consistent with the direction of those provisions, which seek to ensure that future subdivision and land use development is appropriately serviced, integrated with available or planned infrastructure, and addresses three waters capacity, hydraulic neutrality and water-sensitive design matters through future resource consent and engineering approval processes.
- (13) In coming to the above conclusion, I or Cuttriss personnel under my direction have:
  - a) Searched the underlying record of title for the application site.
  - b) Searched service records and reviewed available servicing information in the vicinity of the site.
  - c) Carried out a topographical survey of the subject site.
  - d) Liaised with the Hutt City Council (HCC) Subdivisions Engineering Team and Wellington Water Limited (WWL) regarding services capacity in relation to the site.
  - e) Reviewed the site context and Cuttriss' local project information for 221 and 239 Wise Street, 246 Wise Street, the Wise Street extension, and 120 Upper Fitzherbert Road.
  - f) Liaised with utilities providers in relation to servicing a possible Medium Density Residential development comprising of approximately 70 to 100 residential lots.
  - g) Physically inspected the site.
  - h) Prepared concept plans showing a potential residential layout, road corridor arrangement, watercourse corridor, and stormwater management area for the site.

### **3 Summary of Expert Assessment**

- (14) In my opinion, there is a feasible civil engineering pathway to service future residential development of the site if the rezoning is approved. The key civil engineering matters are water supply, wastewater mitigation, stormwater management, and confirmation of standard utility servicing.
- (15) I do not consider it appropriate to represent the site as being immediately serviceable by the existing three waters networks without further assessment or design. However, based on the information I have reviewed, I am satisfied that the identified servicing constraints are capable of being resolved through feasible engineering solutions. Those solutions would include integration with planned infrastructure upgrades, particularly for water supply, together with site-specific wastewater and stormwater mitigation as required by Hutt City Council and Wellington Water Limited through the subdivision or land use consent and engineering approval processes.
- (16) The following is a summary of our findings from the investigation work as listed in Clause 13 above:

#### **Site and Indicative Layout**

- (17) The subject land is 104 Upper Fitzherbert Road, Wainuiomata, legally described as Lot 1 DP 80607 and comprising approximately 4 hectares. The site has frontage to Upper Fitzherbert Road to the west, with the Wise Street corridor to the southeast.
- (18) 31085 SK1 is an indicative feasibility layout rather than a detailed subdivision layout. It shows Wise Street extending along the eastern side of the site and internal roads serving the proposed lots. In my opinion, the layout demonstrates that residential development in the order of 70 to 100 lots can be considered at a plan change level, subject to the detailed matters addressed below and in the evidence of others.

#### **Water Supply**

- (19) Water supply is a known infrastructure constraint in Wainuiomata and is one of the key servicing matters relevant to the proposed rezoning. Based on the correspondence provided, Wellington Water Limited has advised at a high level that three waters requirements for this part of Wainuiomata were assessed to some extent as part of Wellington Water growth studies completed in 2022, which were used to inform the 2024-34 Long Term Plan.

- (20) The Hutt City Council Development and Financial Contributions Policy 2024, amended in 2025, identifies the Wainuiomata Water Supply Storage and Network Upgrades project. The project is described as a new 8ML reservoir to support growth and lift existing levels of service in Wainuiomata. The WWL/HCC Three Waters Growth Study provides further context, identifying that approximately half of the new reservoir storage is required to address existing level of service issues, with the balance required to support growth.
- (21) Wellington Water has also provided a memorandum to Hutt City Council dated 9 October 2025 titled *Wainuiomata Water Supply Storage Improvement and New Connections Approval*. That memorandum records that Wainuiomata has a significant reservoir storage shortfall, comprising approximately 4ML to address an existing level of service gap and 4ML to support growth. Importantly, it also records that Hutt City Council has approved a plan to bring forward delivery of the new reservoir and that, on that basis, Wellington Water advises that new water connections can continue. For developments of 51 lots or more, new connections are subject to pressure and fireflow review and water-saving measures through the building stage.
- (22) The same memorandum records that the new reservoir project has commenced, with Wellington Water initiating site optioneering, site selection and concept/preliminary design in the 2025/26 financial year. It also records that residential water meters in Wainuiomata are a high priority and are scheduled to commence around mid-2026, and that leak remediation is part of the routine programme to reduce water loss and improve network resilience.
- (23) Wellington Water Limited's Three Waters Advice and Assessment for 221 and 239 Wise Street, dated 14 January 2025, remains useful local context because that development is immediately south of the subject site. That assessment records the reservoir storage deficit and also records that local water network modelling undertaken in 2022 indicated minimum pressure at 231 Wise Street of approximately 50 to 55m and expected fire flow capacity from existing hydrants to be compliant with PAS NZS4509:2008 FW2 requirements. I understand that any future development of 104 Upper Fitzherbert Road would still require site-specific confirmation of pressure, fireflow and network effects through detailed design and Wellington Water review. This is a standard resource consent requirement for a development of that size.
- (24) Water supply reticulation for the site is expected to be provided by extension of the public network along the Wise Street corridor, subject to confirmation through detailed design and Wellington Water/Hutt City Council approval. Based on the information reviewed, existing

and consented water infrastructure in the Wise Street corridor provides a logical servicing route to the subject site.

- (25) In my opinion, water supply remains a known constraint in Wainuiomata, but the information available confirms that there is an identified and actively progressing servicing pathway. Wellington Water's 9 October 2025 memorandum confirms that new connections can continue while the new reservoir project is progressed, subject to pressure and fireflow review and water-saving measures for developments of 51 lots or more. On that basis, I do not consider water supply to be a fundamental civil engineering constraint to rezoning, provided that future development of the site is supported by detailed design, any required water-saving measures, and the relevant Hutt City Council and Wellington Water approval processes. Water-saving measures for a future development could include non-potable stormwater reuse, such as rainwater tanks plumbed into dwellings, which I discuss further in relation to stormwater management below.

#### **Wastewater**

- (26) I have not reviewed a site-specific WWL wastewater capacity assessment for 104 Upper Fitzherbert Road. However, WWL's advice for the immediately adjoining 221 and 239 Wise Street development records that there is no spare downstream design capacity and that wastewater mitigation is required. That advice also records that a low-pressure sewer system is acceptable to WWL, provided it is designed in accordance with the relevant pressure sewer design requirements. This is also consistent with discussions held with Hutt City Council on 30 April 2026, where Council officers reiterated that wastewater capacity in the receiving network is constrained and that mitigation would be required for future development of the site.
- (27) The Development Contributions Policy identifies the Wainuiomata North Wastewater Trunk Network Upgrade to address existing capacity constraints and provide for growth servicing in the upper Wise Street areas of Wainuiomata North. I do not rely on the Wainuiomata North Wastewater Trunk Network Upgrade being available to service the site at the rezoning stage. However, its inclusion in the Development Contributions Policy confirms that Hutt City Council has identified wastewater capacity constraints in the upper Wise Street area and has identified a growth-servicing response. In my opinion, this supports the approach of treating wastewater as a mitigation and staging matter to be resolved through future design and approval processes.

- (28) Wastewater mitigation can be achieved by storing wastewater at 'peak' times defined by WWL and then discharging the wastewater to the downstream network at off-peak times. It is anticipated that this would be managed through appropriately sized individual pumps as part of a low-pressure wastewater network. Additionally, a low-pressure wastewater network may also reduce infiltration risk relative to a conventional gravity network, subject to detailed design. The details of the solution would be determined following further consultation with HCC and WWL before or as part of any future subdivision or land use resource consent application for the development of the site. The wastewater system would be designed in accordance with WWL Regional Standard for Water Services and the Wellington Water Pressure Sewer Design Guide.
- (29) In my opinion, the need for wastewater mitigation does not represent a fundamental engineering barrier to rezoning.
- (30) The wastewater system could either discharge to an extension of the existing council owned 150mm wastewater main in Wise Street, or to the existing council owned 150mm wastewater main within the western boundary of the subject site. Given the intensification of land along Wise Street, and development patterns to the south, it is anticipated that any development would connect into the council main within the subject site.

### **Stormwater**

- (31) Stormwater management for the layout 31085 SK1 has been considered at a feasibility level. The layout provides a 10m corridor around the northern and western parts of the development area and a stormwater management area in the south-western part of the site. These areas provide spatial allowance for stormwater conveyance, detention, retention, treatment and maintenance access. The corridor also provides an opportunity to integrate planting and watercourse/ecological outcomes, with those matters addressed in the evidence of others.
- (32) I consider that the most practical and effective means of discharging stormwater from a development of the site would be by way of controlled discharges to Black Creek. Careful consideration would need to be given to the size of contributing catchments and resulting flows at each discharge point. Where practicable, stormwater would need to remain within its original catchment defined by the pre-development topography so that post-development flows are the same as pre-development flows.

- (33) Stormwater neutrality would be required for any development of the site due to the lack of capacity in downstream networks. For any future development of the subject site, individual retention/detention tanks on each future allotment, and/or a centralised stormwater detention basin with restricted diameter outlet pipes could be utilised for managing run-off from roads and housing. A preliminary concept-level stormwater model has been run by Cuttriss, in general accordance with the Wellington Water Design Guide for Storm Hydrology. That modelling indicates that, for a development with a minimum 30% permeable surface area as anticipated under the Medium Density Residential Zone provisions, approximately 440m<sup>3</sup> of storage would be required to achieve stormwater neutrality for both the 10% and 1% annual exceedance probability events. The final storage requirement and solution would be confirmed through future resource consent design.
- (34) Subject to final staging, future development would likely result in areas of earthworks in excess of 3000 m<sup>2</sup>, and/or the introduction of over 1000 m<sup>2</sup> of impermeable areas. As a result, stormwater treatment and hydrological control would likely be required to meet the standards of Greater Wellington Regional Councils Plan Change 1 to the Natural Resources Plan. The WWL Water Sensitive Design for Stormwater Treatment Device Design guide outlines four options for stormwater treatment, these being constructed wetlands, bioretention (raingardens), vegetated swales and pervious paving. Based on current Wellington Water guidance and practice, centralised bioretention is likely to be an appropriate stormwater treatment option for this site and can be incorporated into the stormwater management area. Hydrological control requirements can also be addressed through measures such as stormwater tanks plumbed into dwellings for non-potable reuse, soakage or groundwater recharge, evapotranspiration, permeable paving and good urban design. In my opinion, stormwater reuse, particularly through rainwater tanks connected for non-potable household or outdoor use, could also contribute to the water-saving measures anticipated by Wellington Water for developments of 51 lots or more in Wainuiomata.
- (35) The current SK1 layout includes a watercourse corridor to allow for primary and overland flow paths coming into the subject site from the north, and a stormwater management area. Preliminary sizing of the watercourse corridor is 10m wide, which accounts for conveyance of primary and secondary flows into the site, planting, any ecological enhancements required, and maintenance access. Preliminary space allowance for the stormwater management area (excluding the 10m channel corridor) is 3228m<sup>2</sup>, which allows for sufficient area to address detention (440m<sup>3</sup>), retention, treatment (74m<sup>2</sup>), and any flood-related functions identified in the flood evidence. Final sizing would be determined as part of any resource consent

submission and subsequent detailed design. It is anticipated that the watercourse corridor and stormwater management area could be vested in Council or otherwise protected and maintained through an appropriate ownership and maintenance arrangement, subject to Council approval at resource consent and engineering approval stage.

(36) A comprehensive stormwater assessment would need to be provided with any future subdivision or land use consent application. That assessment would confirm the final stormwater management approach, including conveyance, treatment, retention, detention, outlet controls, maintenance access, and integration with any watercourse corridor, such as that shown on SK1.

(37) In my opinion, the stormwater matters identified above do not represent a fundamental civil engineering constraint to rezoning. The requirements for stormwater neutrality, treatment, hydrological control, maintenance access and appropriate long-term management are standard and anticipated matters for residential development in constrained urban catchments. The SK1 layout provides sufficient spatial allowance at a feasibility level through the 10m watercourse corridor and stormwater management area, with final sizing and design to be confirmed through any future subdivision or land use consent application and associated engineering approval process.

### **Flooding**

(38) Flood hazard modelling, minimum floor levels, flood storage, overland flow management and wider flood effects are addressed in the evidence of others. My evidence is limited to how the indicative layout provides space for the stormwater and watercourse infrastructure required to support future development.

### **Electricity Supply**

(39) Wellington Electricity has advised that a residential development of this scale would require at least one additional substation, with any wider network works likely limited to extending existing low-voltage and high-voltage infrastructure to connect the development into the surrounding network. On that basis, I consider electricity servicing to be feasible, with the final substation location, transformer sizing, cable routes, and technical approval matters to be confirmed as part of any detailed design at subdivision or land use stage.

### **Telecommunications**

- (40) Chorus confirmed that their reticulation can be extended to provide connection availability and that the network has capacity to service the telecommunications needs of any proposed development of this site.

### **Record of Title**

- (41) I am not aware of any record of title interests that would prevent the civil servicing approach described in my evidence, subject to normal detailed design and consenting processes.

## **4 Section 42A Response**

- (42) I have reviewed the section 42A report for the Rural Zones hearing stream insofar as it relates to 104 Upper Fitzherbert Road. I understand that the reporting officer recommends rejecting the requested rezoning at this stage, primarily because of concerns relating to water supply, wastewater disposal, stormwater management and transport. I also understand that the reporting officer has indicated that further technical information provided before the hearing will be considered, including with input from Council's technical experts. Transport matters are outside the scope of my evidence, except to the extent they relate to the physical provision of civil infrastructure. Those matters are addressed by others.
- (43) My evidence responds to the three waters and civil servicing matters identified in the section 42A report. I acknowledge that there are existing three waters constraints in Wainuiomata and I do not suggest that the site is immediately serviceable by existing networks without further assessment, design or mitigation. However, in my opinion those constraints do not amount to a fundamental civil engineering reason to reject the proposed rezoning.
- (44) In relation to water supply, I rely on the Wellington Water memorandum dated 9 October 2025, discussed earlier in my evidence. That memorandum confirms that, although Wainuiomata has a known reservoir storage shortfall, Hutt City Council has approved bringing forward the new reservoir and Wellington Water has advised that new connections can continue, subject to pressure and fireflow review and water-saving measures for developments of 51 lots or more. That position is also consistent with the Wellington Water assessment for the adjoining 221 and 239 Wise Street development, which records that local network modelling indicated minimum pressure of approximately 50 to 55m at 231 Wise Street and expected fireflow capacity from existing hydrants to be compliant with PAS NZS 4509:2008 FW2 requirements.

- (45) In my opinion, that advice confirms that water supply remains a known constraint, but one with a recognised and actively progressing servicing pathway. I therefore do not consider water supply to be a fundamental barrier to rezoning. Any future development would need to demonstrate that pressure, fireflow, staging and any required water-saving measures can be achieved through detailed design and the relevant Hutt City Council and Wellington Water approval processes.
- (46) In relation to wastewater, I accept that the receiving network is constrained and that mitigation will likely be required. That position is consistent with the advice provided for the adjoining 221 and 239 Wise Street development, which identified downstream capacity constraints but also accepted a low-pressure sewer system provided it is designed in accordance with the relevant Wellington Water requirements. The Development Contributions Policy also identifies the Wainuiomata North Wastewater Trunk Network Upgrade to address existing capacity constraints and provide for growth servicing in the upper Wise Street area. In my opinion, wastewater servicing is feasible subject to mitigation, staging, detailed design and Wellington Water Limited/Hutt City Council approval.
- (47) In relation to stormwater, SK1 provides spatial allowance for stormwater conveyance, overland flow management and stormwater treatment through the 10m corridor and the stormwater management area shown on the plan. The final stormwater design would need to demonstrate hydraulic neutrality, water-sensitive design, appropriate treatment, detention/retention and maintenance access as part of any future subdivision or land use consent application. Flood hazard modelling, overland flow management and off-site flood effects are addressed in the evidence of others. In my opinion, confirming these matters through future resource consent design is a normal and anticipated process for residential development and does not represent a fundamental civil engineering barrier to rezoning.
- (48) From a civil engineering perspective, the servicing approach described in my evidence is consistent with the Proposed District Plan's infrastructure servicing framework. The matters identified in the section 42A report can be addressed through detailed design, infrastructure staging, future subdivision or land use consent processes, and Hutt City Council and Wellington Water Limited engineering approval requirements.

## 5 Conclusion

- (49) Cuttriss Consultants Ltd has reviewed the civil engineering and infrastructure servicing matters relevant to the proposed rezoning of 104 Upper Fitzherbert Road. Drawing 31085 SK1 demonstrates an indicative 72-lot residential layout, and I have assessed servicing feasibility on the basis of an indicative future yield range of approximately 70 to 100 residential lots.
- (50) In my opinion, the information available, including Wellington Water's October 2025 memorandum on Wainuiomata water supply storage improvements and new connections, supports my conclusion that there is a feasible civil engineering pathway to service future residential development of the site. In particular, the identified servicing matters are capable of being managed through planned infrastructure upgrades, mitigation measures, detailed design, and the relevant approval processes. I therefore do not consider the matters identified in the section 42A report to amount to a fundamental civil engineering reason to reject the proposed rezoning. On that basis, I support the proposed rezoning from a civil engineering and infrastructure servicing perspective.

Samuel Robert Godwin

04 June 2026

## MEMO

TO Bruce Hodgins, Strategic Advisor, HCC

COPIED TO Bradley Blucher, Manager Land Development Consenting  
Ben Waters, Manager Engineering Services

FROM Mohammed Hassan, Manager Compliance and Major Developments  
Matthew Hall, Head of Technical and Developer Services

DATE 9th October 2025

### **HCC: WAINUIOMATA WATER SUPPLY STORAGE IMPROVEMENT AND NEW CONNECTIONS APPROVAL**

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#### **Background**

Wainuiomata is a high growth area with many greenfield and brownfield areas identified for development. Approximately 800 new water supply connections have been approved in Wainuiomata over the last 5 years, and in addition similar number of connections are in the pipeline ranging from preapplication to consenting stages.

There is a significant reservoir storage shortfall comprising of level of service gap of around 4.0ML and 4.0ML for growth in the Wainuiomata water supply zone. Based on this significant shortfall of water storage and know risk of previous failures to fill the reservoir in a timely manner Wellington Water had advised Hutt City Council to not approve any new water connections until a new reservoir was scheduled to be constructed.

As Hutt City Council has recently approved a plan to bring forward the delivery of the new reservoir to alleviate the storage shortfall and support growth Wellington Water can advise that new connections can continue as described below:

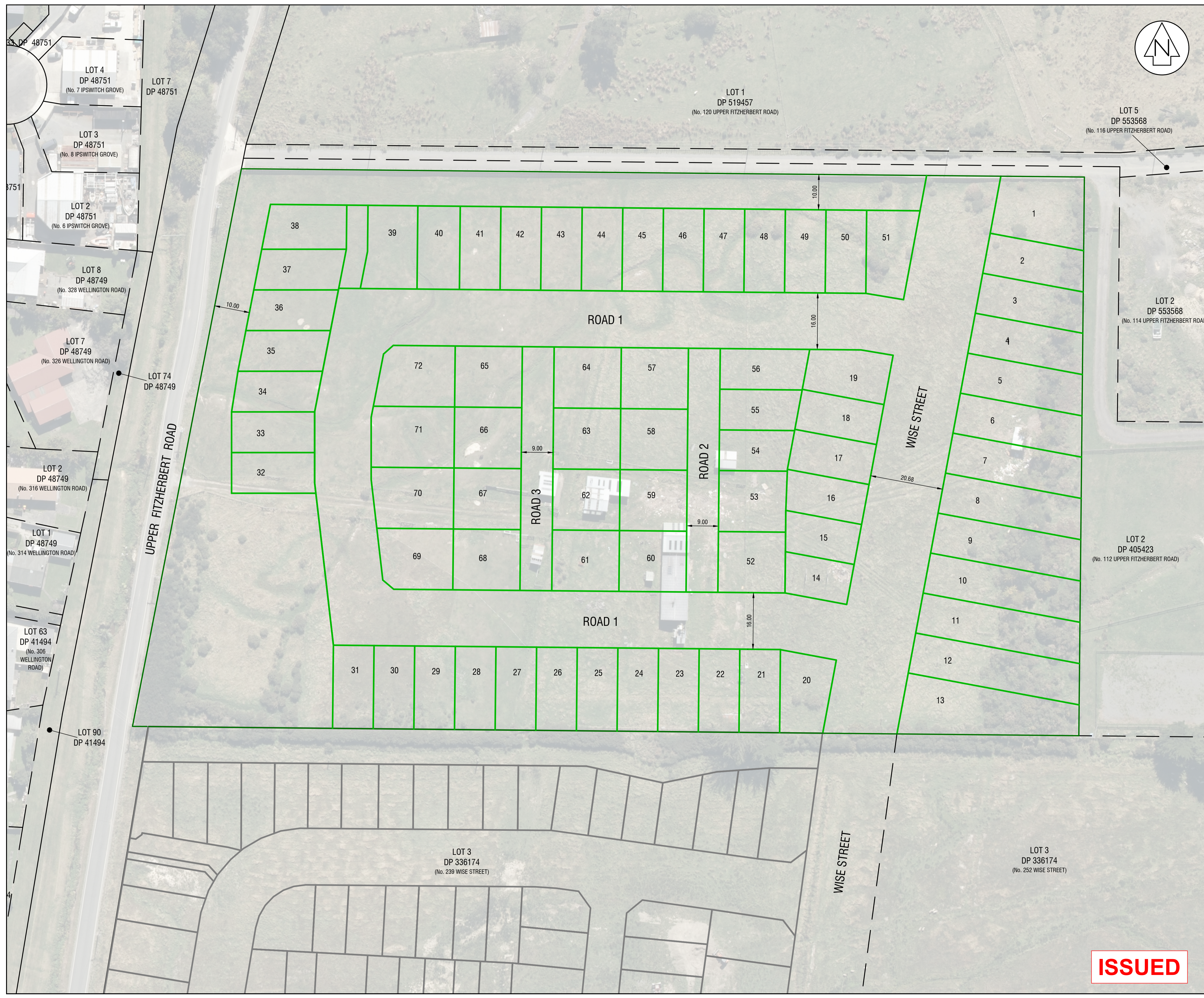
- Less than 50 lots – development proposals and water supply connection applications are reviewed with respect to water supply pressure and fireflow requirements and approved.
- 51 and over lots – to meet requirements for less than 50 lots and developments are conditioned to provide water savings measures through the building stage.

We would also like to advise that the new reservoir project has commenced with Wellington Water initiating the site optioneering, selection, and development of concept/preliminary design in 2025/26 financial year.

Wellington Water is also planning for the residential water meters across the Wellington region. The program to install meters in Wainuiomata is of high priority and is scheduled to commence around mid-2026 which will reduce demand while the new reservoir is delivered.

A proactive approach to leak remediation will also reduce water loss from the network which is now a part of the routine programme which will further increase resiliency in Wainuiomata.

If you require further information or clarification, please feel free to contact - Matthew Hall, Head of Technical and Developer Services.

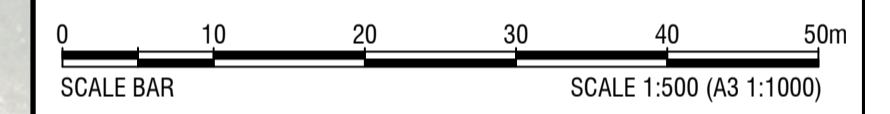


REVISION DETAILS		NAME	DATE
A	FOR EVIDENCE	SRG	05/26

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**SKETCH PLAN**

SCALE <b>A1 - 1:500</b>		REDUCED SCALE <b>A3 - 1:1000</b>	
FIELDWORK	NAME	DATE	DRAWING NUMBER
DESIGNED	SG	04/26	<b>31085 SK1</b>
DRAWN	CG	04/26	SHEET 1 OF 1 SHEETS
CHECKED	SG	04/26	REVISION A

**ISSUED**