BEFORE INDEPENDENT HEARING COMMISSIONERS AT LOWER HUTT

I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE TE AWA KAIRANGI

IN THE MATTER	of the Resource Management Act 1991 (Act)
AND	
IN THE MATTER	of the hearing of submissions on the Proposed Lower Hutt District Plan
HEARING TOPIC	Residential and Rural Zones (Hearing Stream 3)

STATEMENT OF EVIDENCE OF SAMUEL GODWIN ON BEHALF OF SILVERSTREAM PARK CHRISTIAN CENTRE

(CIVIL ENGINEERING)

5 JUNE 2026

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1. INTRODUCTION

1.1. My full name is Samuel Robert Godwin. I am a director and civil engineer at Cuttriss Consultants Limited. I am authorised to give this evidence on behalf of Silverstream Park Christian Centre Charitable Trust.

1.2. I have nine years' experience in civil engineering, land development, three waters infrastructure, stormwater management, flood assessment, infrastructure servicing and subdivision / land development engineering.

1.3. I hold a Bachelor of Engineering with Honours (Canterbury). I am a Chartered Professional Engineer (Civil) and Chartered Member of Engineering NZ.

1.4. I have been involved with the Silverstream Park Christian Centre for some time reviewing the wider site development civil design. I am familiar with the landholdings, activities, facilities, history and future intentions relating to the land at:

(a) 320 Eastern Hutt Road, Stokes Valley.

(b) 3 & 15 Reynolds Bach Drive and Section 2 SO 429576[1].

(c) Sections 1–5 SO 461420.

1.5. While this is a Council level hearing, I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and agree to comply with it. My evidence is within my area of expertise, except where I state that I rely on the evidence of others.

[1] This unaddressed parcel of land owned by Silverstream Park Christian Centre was inadvertently omitted from the submission text but is shown in submission Figure 1.

1.6. My evidence is given in support of Silverstream Park Christian Centre's submission on the Proposed Lower Hutt District Plan.

Scope

1.7. My evidence is limited to the parcels of land outlined in Clause 1.4(a) to 1.4(c), to support the relief requested to rezone Medium Density Residential Zone. I have not addressed the other land parcels, as I understand the General Rural Zone is not contested.

1.8. My evidence addresses:

(a) the existing civil infrastructure and servicing context;

(b) stormwater servicing and stormwater management;

(c) flooding and overland flow considerations;

(d) wastewater servicing;

(e) water supply, including firefighting supply;

(f) the feasibility of servicing future development;

(g) the servicing matters raised in the section 42A report; and

(h) the most appropriate response from a civil engineering perspective.

1.9. I do not address planning merits except where relevant to engineering feasibility. I do not directly address landfill issues. These matters are addressed in the evidence of other witnesses.

1.10. In preparing this evidence, I have reviewed the following documents and information:

(a) Silverstream Park Christian Centre's submission on the Proposed Lower Hutt District Plan;

(b) the Proposed Lower Hutt District Plan maps and relevant zone provisions;

(c) the section 42A report for Residential Zones;

(d) the section 42A report for Rural Zones;

(e) available Hutt City Council infrastructure information;

(f) available Wellington Water infrastructure information;

(g) available topographical information for the site;

(h) available aerial imagery;

(i) available information relating to resource consent application RM240225;

(j) available information relating to resource consent application RM240226;

(k) any existing servicing reports, engineering plans, geotechnical information or civil drawings available for Silverstream Retreat;

(l) available stormwater catchment, watercourse, overland flow path or flood hazard information;

(m) relevant Hutt City Council and Wellington Water engineering standards; and

(n) regional consents for bulk earthworks, culvert upgrades, and stormwater discharges in relation to the proposed event centre and youth centre (RM240225).

1.11. Where information is incomplete or where detailed design has not yet been undertaken, I have identified that in my evidence.

1.12. My evidence is not intended to be a final engineering design for development of the site. The purpose of my evidence is to address whether there is a practicable engineering pathway for development to be serviced and managed, and whether the servicing matters identified in the section 42A report are reasons to reject the requested zoning and precinct relief in full.

2. SITE AND EXISTING SERVICING CONTEXT

2.1. The land relevant to my evidence comprises a substantial landholding at the northeastern edge of Stokes Valley, with the primary access from Eastern Hutt Road and Reynolds Bach Drive, and with secondary access available from the end of Kingsley Street.

2.2. The principal site at 320 Eastern Hutt Road has an area of approximately 16.55 hectares and contains Silverstream Retreat, an established accommodation, conference, assembly, recreation and community facility. The site includes existing buildings, internal accessways, parking areas, utility servicing and outdoor activity areas associated with that established use.

2.3. The land at 3 & 15 Reynolds Bach Drive and Section 2 SO 429576 totaling 4,755m² is associated with the wider Silverstream Retreat context and, as I understand it, is relevant to the future youth centre that has be granted resource consent.

2.4. For the purposes of civil engineering assessment, the site is materially different from a small infill site or fragmented ownership pattern. It is a large and established landholding

where access, three waters servicing, stormwater management and staging can be considered comprehensively through any future resource consent, engineering approval and, where required, network upgrade process.

2.5. Existing service arrangements are understood to include:

Water supply

2.6. Existing water supply arrangements are understood to comprise a connection to a Council-owned 150mm diameter water main within 320 Eastern Hutt Road, near the Kingsley Street entrance. While there is an old in-ground reservoir and several above-ground storage tanks on the southern upper portion of the site, I understand these are no longer in use. The Council-owned 150mm diameter main currently provides the source of supply for the domestic and firefighting needs of the existing Silverstream Retreat activities.

2.7. From the 150mm Council main, a private 150mm water supply main extends from the point of supply to service the Silverstream Retreat facilities. This arrangement is illustrated in Figure 1.

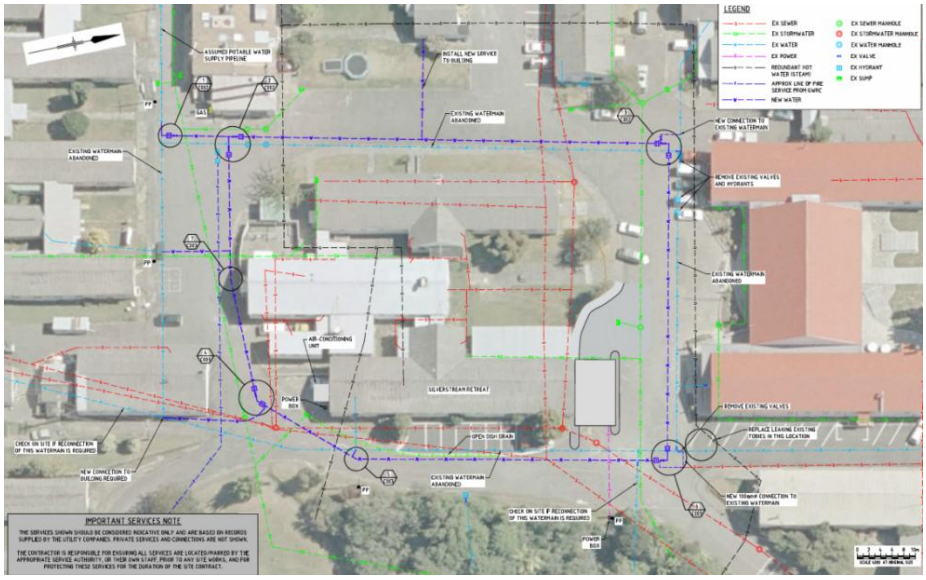

Figure 1: Private water supply for the Retreat

2.8. Pressure and flow testing was carried out by Detection Services on 4 July 2025. That testing recorded an average pressure in the private network at the Retreat of approximately 45m head, with a double hydrant test delivering 44 L/s.

2.9. The pressure recorded by Detection Services is consistent with the relevant Wellington Water pressure requirements for reticulated water supply. The tested flow of 44 L/s is also consistent with the firefighting flow requirements for an FW2 classification under PAS NZS 4509:2008. I consider FW2 to be an appropriate reference point for the residential housing typologies generally anticipated within a Medium Density Residential Zone. The final firefighting classification for any specific future development would need to be confirmed at resource consent or detailed design stage, having regard to the proposed activity, building form, distance to hydrants, sprinkler provision and Fire and Emergency New Zealand requirements.

2.10. If future development cannot be adequately serviced by the existing water supply infrastructure in its current configuration, available water supply and firefighting options include:

(a) extension of public reticulated water supply, if feasible;

(b) upgrade of existing private water supply infrastructure;

(c) provision of additional hydrants;

(d) adjustment of the existing pressure reducing valve, subject to network assessment and approval;

(e) provision of additional on-site reservoir storage;

(f) provision of dedicated firefighting water storage;

(g) rainwater harvesting for non-potable uses to reduce potable water demand; and

(h) other approved water supply arrangements, subject to Hutt City Council, Wellington Water Limited and Fire and Emergency New Zealand requirements.

2.11. In my opinion, the information available confirms that water supply is available to the site and that the existing system currently provides for the domestic and firefighting needs of the established Silverstream Retreat activities. The Detection Services testing also demonstrates that there is measurable pressure and flow within the private reticulation system, including a tested firefighting flow consistent with FW2 requirements under PAS NZS 4509:2008.

2.12. I do not consider water supply to be a fundamental civil engineering constraint to rezoning. Future residential

development or expanded event centre and youth centre development would still require site-specific confirmation of demand, pressure, firefighting classification, hydrant coverage, storage requirements, network effects and any necessary upgrades through the resource consent and engineering approval processes. However, in my opinion, the existing water supply arrangement, together with the available upgrade and mitigation options, provides a feasible servicing pathway.

Wastewater

2.13. The existing Silverstream Retreat activities discharge wastewater to the Council-owned 225mm diameter wastewater main (used as the landfill leachate main) that passes through 320 Eastern Hutt Road. This main is understood to extend from the Silverstream Landfill area and generally runs parallel to Reynolds Bach Drive through the northern part of the site.

2.14. The landowner, Silverstream Park Christian Centre, has also recently secured a private easement to enable the Council wastewater network to be extended from the terminal manhole within 81 Kingsley Street to service the upper southern portion of 320 Eastern Hutt Road.

2.15. The preferred wastewater servicing option for future development is likely to be gravity discharge to either:

(a) the existing 225mm diameter Council wastewater main traversing the northern portion of 320 Eastern Hutt Road; or

(b) the future extension of the Council wastewater network from the terminal manhole within 81 Kingsley Street, as described in clause 2.14.

2.16. The final connection arrangement would depend on the location, levels, staging and scale of future development, together with confirmation of downstream network capacity and any requirements of Hutt City Council and Wellington Water Limited.

2.17. Depending on the nature, scale and timing of any future development, it remains possible that Wellington Water Limited would require wastewater mitigation. Wastewater mitigation can be achieved by storing wastewater during peak network periods, as defined by Wellington Water Limited, and discharging to the downstream network during off-peak periods. The details of any required mitigation would be determined through further consultation with Hutt City Council and Wellington Water Limited before, or as part of, any future subdivision or land use resource consent application for development of the site.

2.18. Any future wastewater system would be designed in accordance with the Wellington Water Regional Standard for Water Services. If a pumped, low-pressure or controlled-discharge system is required, the relevant Wellington Water pressure sewer design requirements would also apply.

2.19. I understand that Hutt City Council did not require wastewater mitigation for the recently consented event centre and youth centre development, on the basis that it was demonstrated that post-development wastewater flows would not exceed pre-development flows. In my opinion, that is relevant because it demonstrates that mitigation requirements are dependent on the actual wastewater demand and discharge characteristics of the proposed development, rather than being an automatic requirement for all development of the site.

2.20. In my opinion, the potential need for wastewater upgrades or mitigation is not, of itself, a reason to reject the requested rezoning relief. The site is already served by Council wastewater infrastructure, and there is also a pathway to extend the Council network from Kingsley Street to service the upper southern portion of the site. If future development generates wastewater flows that exceed available downstream capacity, that can be addressed through detailed design, staging, local network upgrades, storage, pumping, off-peak discharge controls or other approved mitigation. These are standard engineering matters that can be assessed and resolved through the future resource consent and engineering approval processes.

2.21. On that basis, I do not consider wastewater servicing to be a fundamental civil engineering constraint to rezoning.

Stormwater

2.22. The Silverstream Retreat currently discharges stormwater to the mapped watercourse that traverses the north-eastern portion of the site. This watercourse passes under Reynolds Bach Drive and Eastern Hutt Road before discharging to the Hutt River / Te Awa Kairangi. Several other natural gullies are located within the site and convey stormwater runoff from the upper slopes.

2.23. I understand there is no public piped stormwater network servicing the site. Stormwater management for any future development would therefore need to be based on a site-specific stormwater management approach that responds to the existing natural drainage pattern, mapped watercourses, overland flow paths and downstream receiving environment.

2.24. The site contains natural drainage features and watercourses. These features are important physical constraints and should be taken into account in any future development layout. In my opinion, they also provide an opportunity to integrate stormwater conveyance, detention, treatment, planting, erosion protection and ecological enhancement within a comprehensive site layout.

2.25. I agree that more intensive development would increase impervious surface area relative to the existing environment. Increased impervious surface can increase peak runoff, runoff volume, contaminant load, erosion risk and downstream effects if not managed through appropriate design solutions.

2.26. Any future development should therefore be required to demonstrate that stormwater effects can be managed to an acceptable standard. In my opinion, this can be achieved through modern stormwater management techniques, including:

(a) on-site detention to manage peak flows;

(b) retention and reuse of roof water;

(c) water-sensitive urban design;

(d) raingardens, swales, wetlands or other treatment devices;

(e) proprietary treatment devices where appropriate;

(f) catchment-based stormwater management;

(g) erosion and scour protection at discharge points;

(h) protection of overland flow paths;

(i) protection and enhancement of natural watercourses;

(j) defined building setbacks from watercourses; and

(k) long-term maintenance and operation plans.

2.27. 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, hydrological control, outlet controls, erosion and scour protection, overland flow paths, maintenance access, and integration with the existing watercourses and natural drainage features on the site.

2.28. In my opinion, the stormwater matters identified above do not represent a fundamental civil engineering constraint to rezoning. It is not unusual for sites of this nature to be serviced without direct reliance on a public piped stormwater network, provided stormwater effects are appropriately managed through a site-specific design response. In this case, that response would need to work with the existing watercourses, natural gullies and overland flow paths, and would be confirmed through future resource consent and engineering approval processes.

2.29. Designing around existing site features, and the requirements for stormwater neutrality, treatment, hydrological control, erosion protection, maintenance access and appropriate long-term management, are standard and anticipated matters for residential development in constrained urban catchments. These matters can be assessed and resolved through the future resource consent and engineering approval processes.

Flooding

2.30. Flood modelling has been undertaken by a private consultancy for the recently consented event centre and youth centre within the site (RM240225). That modelling provided site-specific information on flood behaviour relevant to that proposal and resulted in minimum floor levels being recommended for the proposed buildings to manage inundation risk in a 1% annual exceedance probability storm event.

2.31. I understand that Wellington Water Limited does not currently hold a public flood model for this site. In my opinion, the absence of a Wellington Water flood model does not mean that flood risk cannot be assessed or managed. Rather, it means that future development proposals would need to be supported by appropriate site-specific flood modelling and assessment.

2.32. Any future subdivision or land use consent application for residential development would need to confirm the relevant flood hazards, overland flow paths, flood depths, flood extents, velocities, appropriate minimum floor levels, safe access considerations and any effects on upstream or downstream properties. The scope of that assessment would depend on the location, scale and staging of future development.

2.33. In my opinion, flooding does not represent a fundamental civil engineering constraint to rezoning. The recent event centre and youth centre consent demonstrates that site-specific flood assessment can be undertaken for development within the site, and that appropriate minimum floor levels and design responses can be identified through the resource consent process. Future residential development would need to follow the same approach, with the final design response confirmed through site-specific

modelling, resource consent and engineering approval processes.

Access / internal roading

2.34. The main road access to Silverstream Retreat is via Eastern Hutt Road and Reynolds Bach Drive. A series of formed, sealed, private internal loop roads provide access to the various accommodation, conference, recreation and community facilities within the northern portion of the site.

2.35. An existing unsealed access track, with grades of up to approximately 1V:5H, provides occasional internal access from the Retreat to the upper southern portion of the site. I do not rely on that track as the primary access arrangement for future residential development. Any future reliance on that corridor would require detailed assessment of formation width, longitudinal grade, pavement construction, drainage, turning, passing, emergency access and safety.

2.36. In addition, the landowner has recently obtained approval to create a right of way over the Council-owned parcel at the end of Kingsley Street, being Lot 105 DP 31331. Once the right of way has been registered, the southern upper portion of 320 Eastern Hutt Road will have an additional practical vehicle access route from Kingsley Street.

2.37. In my opinion, the availability of access from Eastern Hutt Road / Reynolds Bach Drive, together with the approved right-of-way access from Kingsley Street, provides a feasible access framework for future development of the site. The final access arrangement for any future subdivision or land use development would need to be confirmed through detailed design and would

be subject to Council approval. Matters to be addressed at that stage would include road geometry, gradients, intersection form, sight distances, pedestrian connectivity, emergency vehicle access, refuse servicing, construction access and the appropriate public or private status of any internal roads.

2.38. I do not consider access or internal roading to be a fundamental civil engineering constraint to rezoning. The site has existing formed access serving the established Silverstream Retreat activities, and an additional approved access pathway from Kingsley Street is available to support future development of the upper southern portion of the site, subject to registration and detailed engineering design.

Utilities

2.39. The Silverstream Retreat is connected to electricity and telecommunications networks. I am not aware of any existing limitation in those networks that would prevent future development of the site being serviced.

2.40. For any future residential or expanded event centre and youth centre development, the final electricity and telecommunications servicing arrangements would need to be confirmed with the relevant network utility providers at the time of detailed design. Depending on the scale and staging of development, this may include extension, upgrading or relocation of existing utility infrastructure within the site.

Overall servicing conclusion

2.41. The existing Retreat operation demonstrates that the site is already supported by a combination of civil infrastructure and site-specific servicing arrangements. That existing servicing

context includes access, water supply, wastewater servicing, stormwater discharge paths, electricity and telecommunications connections.

2.42. My assessment is that there is a feasible servicing pathway for future residential development or expanded event centre and youth centre development of the site through a combination of existing infrastructure, network upgrades where required, site-specific mitigation, staging and detailed design.

2.43. The details of those servicing solutions would be confirmed through any subsequent subdivision or land use consent process and associated engineering approvals. On that basis, I do not consider the existing servicing context to represent a fundamental civil engineering constraint to rezoning.

3. RESPONSE TO SECTION 42A REPORT

3.1. I understand that the Residential Zones section 42A report, and by cross-reference the Rural Zones section 42A report, recommends rejecting Silverstream Park Christian Centre's submission to rezone 320 Eastern Hutt Road to Medium Density Residential Zone.

3.2. I have reviewed the servicing matters identified in the section 42A report. I agree with the reporting officer, and with the Wellington Water advice referred to in that report, that a degree of servicing constraints exist.

3.3. I do not suggest that the whole site is immediately serviceable for medium density residential development without further assessment, design, staging, upgrades or mitigation. However, in my opinion, the constraints identified in the section 42A report do

not amount to a fundamental civil engineering reason to reject the proposed rezoning relief.

3.4. Based on my preliminary assessment, the parts of the site most likely to be suitable for future development are the northern portion of the site adjoining Reynolds Bach Drive, in and around the existing Retreat facilities, and the southern upper portion of the site which can be accessed from Kingsley Street.

Stormwater

3.5. I acknowledge the statement in the section 42A report that there is no public stormwater infrastructure servicing the site.

3.6. In my opinion, that does not mean that stormwater servicing is unavailable. It means that future development cannot rely on a simple connection to a public piped stormwater network and would instead need to be supported by a site-specific stormwater management approach. That approach would need to manage stormwater on-site and discharge in a controlled manner to appropriate receiving environments. This is not unusual for larger urban-edge sites or sites with natural drainage features.

3.7. At this plan hearing stage, the relevant civil engineering question is whether a feasible stormwater management pathway exists. In my opinion, there is such a pathway, subject to detailed design and assessment at the resource consent stage.

Natural Watercourses

3.8. I agree that the site contains natural watercourses and drainage features, and that those features limit the location and extent of future development.

3.9. In my opinion, that does not mean that the site is unsuitable for rezoning. It means that future development needs to be designed around the watercourses, gullies, overland flow paths and steeper landforms. The likely developable areas are therefore not the whole of 320 Eastern Hutt Road. The main constraints are the mapped watercourse through the northern portion of the site, vegetated gullies that accommodate natural runoff, and steeper slopes, particularly along the eastern and western edges of the site.

Impervious Areas

3.10. I agree that more intensive development would likely increase impervious surface area relative to the existing environment.

3.11. The increase in impervious surface area would need to be managed through stormwater neutrality, treatment, retention, detention, hydrological control and appropriate discharge design. These are standard matters for subdivision and land use development in constrained urban catchments.

3.12. In my opinion, the potential increase in impervious surface area is not, of itself, a reason to reject rezoning. It is a matter that can be assessed and managed through future resource consent design.

Flood modelling

3.13. I acknowledge the comment in the section 42A report that Wellington Water does not currently hold a flood model for the site.

3.14. In my opinion, the absence of a Wellington Water flood model does not mean that flood risk cannot be assessed or managed. It means that future development proposals would need to be

supported by appropriate site-specific flood modelling and assessment. I note that this is not just a resource management issue, it will also be a matter for any future building consent.

3.15. Flood modelling has already been undertaken by River Edge Consulting Limited for the recently consented event centre and youth centre within the site. That modelling resulted in minimum floor levels being recommended for the proposed buildings to manage inundation risk in a 1% annual exceedance probability storm event.

3.16. In my opinion, it may not be appropriate to assume that all parts of the land are suitable for the same intensity of development. However, it is equally inappropriate to assume that no part of the site can support more enabling zoning and development simply because Council-wide flood modelling has not been completed.

Wastewater

3.17. I acknowledge the comment in the section 42A report that wastewater servicing to support additional development is possible, but may rely on developer-provided local network upgrades, pumps, off-peak discharge controls and contributions towards wider strategic network solutions.

3.18. I agree that future development may require wastewater upgrades or mitigation. However, in my view that is materially different from saying that wastewater servicing is unavailable.

3.19. The existing Silverstream Retreat discharges to a Council-owned 225mm diameter wastewater main within the site. In addition, the landowner has secured an easement to enable the Council wastewater network to be extended from the terminal manhole within 81 Kingsley Street to service the upper southern portion of

320 Eastern Hutt Road. In my opinion, wastewater servicing is feasible. The final servicing arrangement would need to be confirmed through detailed design, including assessment of downstream capacity, levels, staging, connection location and any required mitigation. I do not consider the potential need for wastewater upgrades, pumping, storage or off-peak discharge controls to be a fundamental engineering constraint to rezoning.

Water supply

3.20. I acknowledge the statement in the section 42A report that there is no public reticulated water supply available for direct connection adjacent to the site, and that existing water supply has historically included private infrastructure.

3.21. In my opinion, the statement does not fully reflect the current servicing position. I have previously described the existing water supply arrangements and pressure and flow testing.

3.22. I agree that future development would require a site-specific water supply strategy to confirm demand, pressure, fire flow, hydrant coverage, storage requirements, staging and any network effects. However, there is not an absence of water supply to the site. On the information available to me, it appears that water supply is available, and there are feasible options to upgrade or supplement the existing arrangements if required.

3.23. I therefore do not consider water supply to be a fundamental civil engineering constraint to rezoning.

4. CONCLUSION

4.1. The subject site has a degree of servicing constraints that require careful management. Those constraints include stormwater,

flooding, wastewater, water supply and firefighting supply. In my opinion, those matters are capable of being addressed through a combination of detailed design, infrastructure upgrades, private infrastructure where appropriate, mitigation measures and staged development. That approach is already being applied through the ongoing development and implementation of the site development plan that is illustrated in the evidence of **Mr Ross**.

4.2. From a civil engineering perspective, the servicing constraints identified in the section 42A report are not fatal to the relief sought by Silverstream Park Christian Centre. The site is not unconstrained, but nor is it unserviceable.

4.3. In my opinion, there is a feasible civil engineering pathway to service future development of the site, particularly within the northern portion of the site adjoining Reynolds Bach Drive and the southern upper portion of the site accessed from Kingsley Street. The final servicing solutions would appropriately be confirmed through future subdivision or land use consent processes and associated engineering approvals.

4.4. I therefore do not consider that three waters, flooding, firefighting or utility servicing matters identified in my evidence provide a fundamental civil engineering reason to reject the requested rezoning relief.

Samuel Robert Godwin
Dated 5 June 2026