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 STUART JAMES EDGAR FARRANT ON BEHALF OF WASTE MANAGEMENT NZ LIMITED AND TE KĀREAREA LIMITED (HEARING STREAM EIGHT)

WATER MANAGEMENT

27 OCTOBER 2026

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1. EXECUTIVE SUMMARY

1.1 This statement of evidence addresses water management matters relating to the proposed rezoning of 30 Benmore Crescent, Manor Park ("**Site**") from General Rural to General Industrial zone, with a Benmore Crescent Precinct, or to a Special Purpose Industrial zone in the Proposed Plan.

1.2 The Site is a level platform of compacted engineered fill over free-draining alluvial gravels, located between Dry Creek and Te Awa Kairangi / Hutt River ("**Te Awa Kairangi**"). Both waterways already receive untreated stormwater from upstream sources outside the Site, including State Highway 2 ("**SH2**") and the wider urban and rural catchment.

1.3 Stormwater from any industrial development of the Site would be managed in the same way as other urban land uses, in accordance with the Wellington Water "Water Sensitive Design Guidelines" (2019) ("**WSD Guidelines**") and Greater Wellington Regional Council ("**GWRC**") Hydrological Control guidance, through the Natural Resources Plan for the Wellington Region ("**NRP**"). Those requirements provide for treatment of the most contaminated portion of runoff and retention of stormwater before discharge to surface water or groundwater. The General Industrial zone would be subject to those requirements, as would any other urban zone.

1.4 By comparison, if the Site were used for stock grazing or fertilised cropping under the current General Rural zone, I would expect nutrients to leach through the free-draining gravels to shallow groundwater connected to Dry Creek and Te Awa Kairangi. This is consistent with Mr Allen's evidence that intensive rural production on the Site could affect water quality in those receiving waters. In my opinion, rural use of the Site would present a greater risk to the receiving water environment than development under the proposed General Industrial zone.[1]

1.5 I agree with the Section 42A Officer's Report for Hearing Stream Eight, dated 12 October 2026 ("**Section 42A Report**") that existing provisions in the NRP, together with consent requirements, would appropriately protect freshwater values. Overall, I consider that rezoning the Site to General Industrial does not present an undue risk to the freshwater receiving environment, and I support the rezoning from a water management perspective.

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[1] Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [1.3(d)] and [5.20].

2. INTRODUCTION

2.1 My full name is Stuart James Edgar Farrant. I am a Principal Ecological Engineer and Water Sensitive Design leader at Morphum Environmental Ltd.

2.2 I hold a Bachelor of Engineering (Natural Resources) from the University of Canterbury and a Bachelor of Commerce (Management) from Victoria University.

2.3 I have over 20 years' experience working in multiple aspects of freshwater management and ecological engineering. I have worked for Morphum Environmental for 12 years establishing the southern sector office (Wellington) in 2014. Prior to that, I worked for over 5 years as an Ecological Engineer in Melbourne, Australia following 2 years working for Tonkin & Taylor in Wellington.

2.4 I have experience working in a range of aspects relating to three waters management including design, technical review and auditing of constructed wetlands, vegetated stormwater treatment / conveyance systems, stream restoration and land application. Specifically, I have extensive experience with the design and delivery of integrated stormwater management devices to mitigate adverse water quality effects from urban development in addition to natural wetland restoration projects.

2.5 I have authored and contributed to technical design guidelines for councils and utilities in New Zealand and Australia, including the Wellington Water "Water Sensitive Design Technical Design Guidelines" (2019) and the GWRC Hydrological Controls Guidance.

2.6 I was appointed as chair of Te Awarua o Porirua Whaitua Committee (2015–2019) and was on the Technical Advisory Group for Te Whanganui a Tara Whaitua process (2019–2021).

2.7 I was appointed to the recently assembled Tiaki Wai Stormwater Taskforce, which was tasked with providing guidance to the new water entity on the technical matters related to effectively integrating all aspects of stormwater into the delivery responsibilities in accordance with the Local Government (Water Services) Act 2025.

2.8 I have previously participated in a number of technical advisory panels including the Wellington City Mayoral Taskforce on Three Waters in 2020. I was awarded a 2018 Winston Churchill Fellowship to travel internationally for

the purposes of researching leading practice with urban water management in Europe, Scandinavia and the USA.

2.9 I am a member of Engineering New Zealand and previously Co-Chaired the Sustainability Society which is a technical interest group of Engineering New Zealand.

2.10 I have been engaged by Waste Management NZ Limited ("**WM**") and Te Kārearea Limited ("**TKL**") to assess water management effects relating to the proposed rezoning of the Site to General Industrial zone or a Special Purpose Industrial zone.

2.11 As part of these services I have undertaken a site visit on 15 April 2026, reviewed technical design documentation for the bulk earthworks undertaken by TKL to raise the Site platform above the Te Awa Kairangi flood level (RM220258 and WGN230031) and for WM's proposed resource recovery park (RM230019), and participated in hui with the lead design team, Ngāti Toa (landowner) and WM.

2.12 I am very familiar with the Te Awa Kairangi and Dry Creek receiving environments through a range of previous projects.

Code of conduct

2.13 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I will continue to comply with it when giving oral evidence. Except where I state that I am relying on the evidence of another person, the issues addressed in this evidence are within my area of expertise, and I have not omitted material facts known to me that might alter or detract from my evidence.

3. SCOPE OF EVIDENCE

3.1 This statement of evidence will:

(a) describe the existing Site conditions relevant to water management;

(b) outline the water management measures for the Site under the proposed General Industrial zone and confirm the appropriateness of that zone;

(c) respond to water management matters raised in the Section 42A Report and submissions; and

(d) provide an overall conclusion on WM's and TKL's proposed rezoning of the Site from a water management perspective.

3.2 In preparing this evidence I have read the Section 42A Report as relevant to water management.

4. SITE CONTEXT

4.1 The Site is positioned on land between Dry Creek (north-west) and Te Awa Kairangi (south-east) extending to the confluence of these waterways. The Wairarapa Line rail corridor defines the eastern margin.

4.2 Dry Creek has its headwaters within Belmont Regional Park and is largely free of urban development except for a section of SH2 which discharges untreated stormwater directly into the waterway immediately upstream of the Site.

4.3 Te Awa Kairangi is modified through the reach adjacent to the Site with extensive plantings of exotic willows by GWRC for the purposes of river management as part of the flood control programme. This is intended to reduce the ability of the historically braided river to move laterally and maintain its active channel in the river corridor.

4.4 The Site is underlain with alluvial gravels which have historically been deposited by Te Awa Kairangi prior to urban development in the wider catchment and the need for river management works.

4.5 These historical alluvial gravels have been overlain with engineered fill which has been imported and compacted in accordance with the previous bulk earthworks resource consent (RM220258) as described in Mr Gibson's evidence.[2]

4.6 The Site is now presented as a level platform with limited vegetation or natural features except on the margins of Dry Creek, which separates the narrow portion of the Site between Dry Creek and SH2. I understand these vegetation features are described in Ms McRae's evidence.[3]

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2 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.1(a)], [5.3] and [5.5].

3 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026.

4.7 The fill platform was consented under RM220258 to range from approximately RL 35 m in the north-east of the Site to RL 26 m in the south-west, involving a maximum vertical alteration of up to 6 m.[4] I understand that those earthworks have raised the ground level of the Site above RL 28.0 MSL (mean sea level), being above the minimum level for buildings under the Operative District Plan.[5]

4.8 I understand that the Site is not subject to flooding from Te Awa Kairangi in events up to a 1-in-440-year event, although there is some minor flooding from Dry Creek near the Site entrance.[6]

4.9 Groundwater across the Site is considered to reflect the proximity to Te Awa Kairangi and highly permeable alluvial gravels. Before the bulk earthworks, groundwater was recorded at approximately RL 21 m to RL 24 m, around 3 m below ground level along the south-eastern margin nearest Te Awa Kairangi and around 8 m below ground level at the northern end of the Site.[7] Given the free draining gravels and proximity to Te Awa Kairangi it is not anticipated that the ground water level will have changed significantly since the placement of fill across the site and I therefore expect groundwater is now deeper below the current ground level.

4.10 The current condition of compacted engineered fill over natural alluvial gravels at the Site provides high water infiltration rates of greater than 3.6 m/hr based on previous geotechnical testing.

4.11 There is no existing stormwater infrastructure on the Site. I understand that Hutt City Council and Tiaki Wai do not consider Dry Creek to meet the definition of a "Stormwater Network" under the Local Government (Water Services) Act 2025, partly because it currently receives runoff only from transport infrastructure.

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4 Hutt City Council, Resource Consent Decision RM220258 (Rosco Ice Cream Ltd, 30 Benmore Crescent) dated 21 December 2022 at 2.

5 Hutt City Council, Resource Consent Decision Report RM230018 (Rosco Ice Cream Ltd, 30 Benmore Crescent) dated 27 January 2025 at 46; Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.5].

6 Statement of Evidence of Philip Wallace (Hearing Stream Five) dated 5 August 2026 at [1] and [18]-[20], which concludes that the earthworks on the true left bank of Dry Creek have elevated the platform above the predicted 1% AEP flood level (RCP 8.5 to 2130), while the Dry Creek channel and parts of the true right bank remain subject to flooding at present; Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [8.7]-[8.10].

7 Hutt City Council, Resource Consent Decision RM220258 (Rosco Ice Cream Ltd, 30 Benmore Crescent) dated 21 December 2022 at 3.

4.12 As noted previously, Dry Creek is currently subject to untreated stormwater from SH2 (noted as a very high traffic road) and Te Awa Kairangi is subject to untreated stormwater from the extensive upstream urban areas of Stokes Valley (Hutt City) and the entirety of Upper Hutt City and extensive rural land use including in the Mangaroa River catchment. These existing sources of untreated runoff contribute to the water quality and biodiversity values of the waterways.

5. WATER MANAGEMENT

5.1 Stormwater management in the Wellington Region is typically managed to address both the quality and quantity of stormwater generated from site-specific land use activities and land cover. The regional consenting requirements under the NRP that trigger these matters are addressed in Ms Goodwin's evidence. I do not repeat that detail here but rely on it in reaching the conclusions in this section.

5.2 Potential stormwater impacts are a result of a combination of the surface type and the activities that occur on any given site.

5.3 The difference, in terms of stormwater, between industrial / commercial sites and residential sites generally reflects the scale of impervious (paved or roofed) surfaces and the movement of vehicles on a given site. Industrial / commercial sites will typically present higher impervious cover (roofs and hardstand) as a percentage of the total site extent.

5.4 Instances where specific identified hazardous materials or wastewater are present on an industrial / commercial site are managed separately through the Hazardous Substances and New Organisms Act 1996 and the Health and Safety at Work Act 2015. These existing regulations ensure that site generated stormwater does not contain any industry specific hazardous chemicals or substances which are managed through either a consented trade waste discharge or taken off site as designated hazardous waste (such as used oils etc).

5.5 Therefore, industrial / commercial stormwater is managed in the same manner as stormwater generated from other urban land use such as roading, residential development or carparks.

5.6 Urban stormwater management (regardless of land use) is therefore based on capturing the most contaminated portion of site generated runoff (typically

referred to as the first flush) and treating it to remove dissolved and particulate contaminants prior to discharge to a receiving environment.

5.7 The quantity of stormwater generated is also managed to remove a defined volume of rainfall to mimic natural "losses" resulting from evapotranspiration and infiltration which would occur in an undeveloped site. This retention of a volume of rainfall is referred to as hydrologic controls in the Wellington region. This retention through hydrologic controls is intended to protect receiving streams from flashy flows during frequent smaller rainfall events which are known to cause scour, erosion and sediment mobilisation.

5.8 Where downstream flooding is an identified issue, stormwater can also be managed through detention to attenuate and slowly release flows to match pre-defined flowrates across a range of rainfall events. This detention and controlled release is referred to as hydraulic neutrality in the Wellington region.

5.9 In the Wellington region, urban stormwater management is typically stipulated to be in accordance with the WSD Guidelines and the GWRC Hydrological Control guidance. These existing guidelines define the amount of stormwater that must be diverted and the specific design details of stormwater treatment devices that are verified to provide a reliable level of treatment.

5.10 In practical terms, water quality outcomes are achieved through stormwater management devices that capture 85 – 90% (by volume) of all stormwater runoff from impervious surfaces and provide reliable removal of heavy metals, nutrients, sediments and microplastics to prevent their discharge to downstream receiving environments.

5.11 Water quantity outcomes are achieved through "retaining" up to 15 mm of equivalent rainfall depth through a combination of reuse for non-potable consumptive uses or infiltration to ground.

5.12 Any water discharged to surface or groundwater, regardless of whether it is via the piped stormwater network or infiltration, must first be treated in accordance with the WSD Guidelines to protect surface or groundwater.

5.13 The size (footprint) of required stormwater treatment devices will directly reflect the area of impervious surfaces on a given site rather than the specific site activity.

5.14 These water quality and quantity measures are equally effective for all urban land uses including industrial / commercial due to the nature of urban contaminants that are present in all urban land uses. The avoidance of

adverse stormwater impacts is more related to the effective delivery and lifecycle operation of compliant stormwater treatment than to the site-specific land use itself.

5.15 Instances where industrial / commercial land uses generate a greater amount of contaminants (due to high traffic movements or heavy compound tyres etc) will increase the required frequency of maintenance activities but will not change the required footprint which is defined by the volume of stormwater generated from a given impervious catchment.[8]

5.16 Any future development of the Site would be required to design sitewide stormwater measures to achieve the same level of water quality and water quantity management, consistent with the regional plan requirements addressed in Ms Goodwin's evidence.[9] All stormwater will be managed within individual land titles with all stormwater provided with full comprehensive treatment prior to any discharge.

5.17 Based on the proposed Industrial / commercial land use and my understanding of contemporary stormwater management, I consider that the proposed rezoning will not pose a significant risk to the environment and will represent an improvement on both the Site conditions prior to the recent development (uncontrolled material storage and illegal fly tipping) and the potential allowable use as farmland.

5.18 I note that, due to the presence of free-draining alluvial gravels, I expect the use of the Site for stock and / or fertilised crops would result in nutrient leaching to the shallow groundwater that will directly connect with both Dry Creek and Te Awa Kairangi.

5.19 I therefore consider that the current zoning of General Rural presents a substantially greater risk to the receiving water environment (subject to obtaining any necessary consents) as compared to the proposed General Industrial zoning due to the requirements and commitments to provide robust stormwater management across any industrial developments.

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8 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at [4.10].

9 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at [4.10], [5.49(h)] and [6.15]; Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [7.10]-[7.12].

6. RESPONSE TO SECTION 42A REPORT AND SUBMISSIONS

6.1 I have reviewed the Section 42A Report prepared by Mr Brett Osborne ("**Reporting Officer**") and submissions addressing water management matters. This includes the approximately 134 submissions using a common template (referred to in the Section 42A Report as "Submitter Group A"), which raised concerns about leachate polluting the adjacent waterways, including Dry Creek and Te Awa Kairangi.

6.2 As noted in the Section 42A Report, a number of submitters raised concerns with the risks associated with pollution leaching to groundwater and ultimately impacting on the adjacent Dry Creek and / or Te Awa Kairangi. These concerns were addressed in the Section 42A Report, with the Reporting Officer noting that existing provisions in the NRP and consent conditions would provide an appropriate level of protection to freshwater values.[10]

6.3 I agree with the Reporting Officer. This is consistent with my view that the General Industrial zone will not change requirements for industry standard stormwater management practices to be followed by any future developments.

6.4 In my view, the current General Rural zone presents a greater risk to the environment due to nutrient leaching from stock and / or fertiliser application that could be enabled under that zone. This is supported by Mr Allen's evidence on rural productivity.[11]

7. CONCLUSION

7.1 In conclusion, I am confident that the rezoning of the Site from the existing General Rural zone to General Industrial does not present an undue risk to the freshwater receiving environment based on existing stormwater management rules and practice.

7.2 The implementation of site wide stormwater management measures will be well placed to capture and treat stormwater to mitigate the changes in hydrology from increased impervious cover and remove dissolved and particulate contaminants from site generated stormwater.

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10 Section 42A Report at [207]-[213] and [240].

11 Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [1.3(d)] and [5.20].

7.3 I consider that the proposed stormwater measures will contribute to improved freshwater outcomes when compared to the previous informal land use or potential uses permitted under the existing General Rural zone.

Stuart James Edgar Farrant
27 October 2026