

**BEFORE THE KAIPARA DISTRICT COUNCIL'S HEARING PANEL**

**IN THE MATTER OF**

the Resource Management Act 1991 (**the Act**)

AND

**IN THE MATTER**

An application for Private Plan Change 85 (**PC85**) -  
**MANGAWHAI EAST** by Foundry Group Limited  
(formerly Cabra Mangawhai Limited) and Pro Land  
Matters Company to rezone approximately 94-  
hectares of land at Black Swamp and Raymond Bull  
Roads, Mangawhai

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**STATEMENT OF EVIDENCE OF ANDY POMFRET ON BEHALF OF THE APPLICANTS**

**(Geotechnical Engineering)**

**18 December 2025**

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## INTRODUCTION

## QUALIFICATIONS AND EXPERIENCE

1. My full name is Andrew David Pomfret. I am a Senior Geotechnical Engineer at Initia Geotechnical Specialist and I'm also a Director at Initia.
2. I hold the qualifications of a BE Hons degree in Engineering Geology and Geotechnics, a Fellow of the British Geological Society, Member of Engineering NZ. I have been working in New Zealand for over 20 years and have worked on numerous large residential subdivisions in many regions.
3. Initia was engaged in late 2024 to provide geotechnical assessment and expert evidence on proposed Private Plan Change 85 (**PC85**) - MANGAWHAI EAST by Foundry Group Limited and Pro Land Matters Company (**Applicant**). PC85 proposes to rezone approximately 94-hectares of land at Black Swamp and Raymond Bull Roads, Mangawhai (**Site**) for urban use. My relevant experience includes working on numerous projects involving high liquefaction and lateral spread risk as well as working on many soft soil sites that require some form of ground improvement prior to development commencing.

## EXPERT WITNESS CODE OF CONDUCT

4. Although this is not a hearing before the Environment Court, I record that I have read and agree to and abide by the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's Practice Note 2023. This evidence is within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses as presented to this hearing. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

## PROJECT INVOLVEMENT

5. Initia were originally engaged by Foundry Group Limited to conduct due diligence and further geotechnical investigations to assess the geotechnical hazard issues and / or risk for the land they own, or had under contract, in the "northern area" of the proposed plan change i.e. that portion of the land to the north of Black Swamp Rd and to the south and west of Raymond Bull Rd. This area is shown on the plan below.

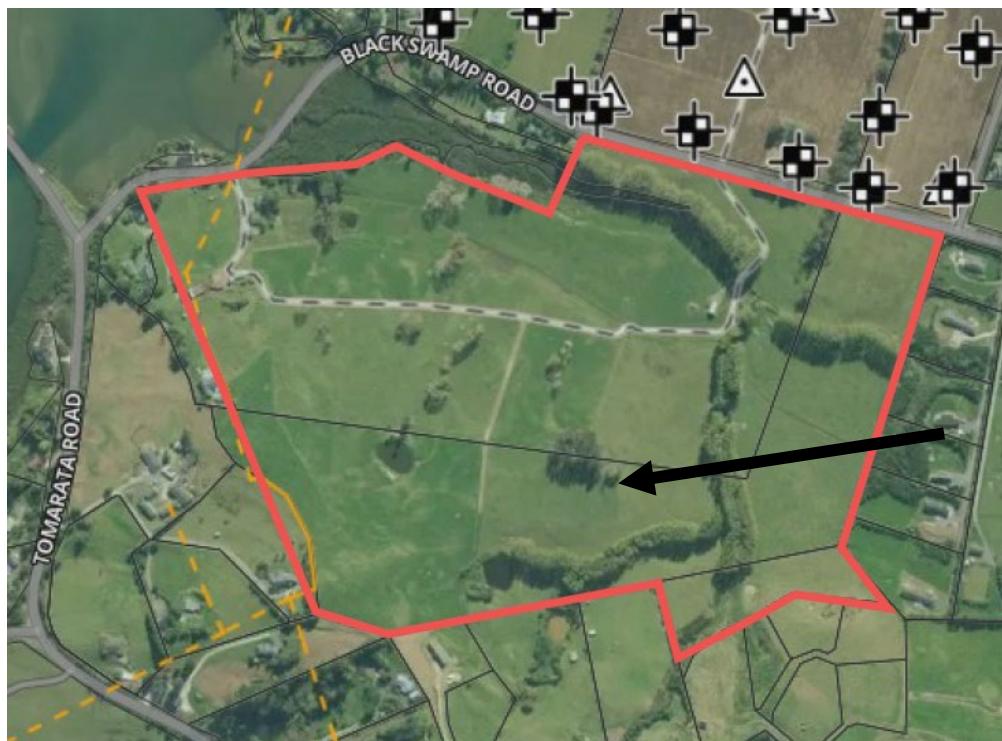


**Figure 1:** Aerial map showing extent of Initia's assessment of the Site's Northern Area

6. Recently Initia<sup>1</sup> was asked to review and provide comments on the work carried out by Wiley Geotechnical for the land to the south of Black Swamp Rd. I have reviewed the extent of the investigations carried out and will make comments relating to this "southern area" being the land owned by Pro Land Matters Company Limited, noting that the plan change extends slightly beyond these boundaries. The Pro Land Matters Company land is as shown on the plan below.

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<sup>1</sup> A team including myself and engineers under my supervision.



**Figure 2:** Aerial map showing boundary (red notation) of the Site's Southern Area originally assessed by Wiley Consultants.

7. For completeness, I note this evidence addresses the geotechnical context of both the Northern and Southern Areas of the Site.

#### SCOPE OF EVIDENCE

8. This evidence is on behalf of Foundry Group Limited (formerly Cabra Mangawhai Limited) and Pro Land Matters Company to provide geotechnical hazard evidence for the Proposal to rezone approximately 94-hectares of land at Black Swamp and Raymond Bull Roads, Mangawhai. I have split my responses into the respective Northern and Southern areas for ease of reference.

#### S42A Report – Northern Area

9. I have read the s42A report and the comments that Council's geotechnical reviewer has made with respect to the assessments undertaken and the risk factors associated with the Northern area. Some additional work including testing for the presence of acid sulphate soils, which will be important for any concrete infrastructure associated with the development, will need to be carried out prior to development. I also intend to

undertake more CPTs<sup>2</sup> and test pits in the north western area (i.e. the proposed Low density zone) to fully understand the liquefaction risks prior to any development occurring. In my opinion, the appropriate time for detailed geotechnical assessment to be undertaken is at the resource consent stage when there is more certainty as to the exact built form outcomes and location.

10. I conclude that all the geotechnical hazards raised within the Initia Geotechnical reports can be mitigated through appropriate earthworks and common engineering designs which will occur at the subsequent land development stage.
11. There are no geotechnical risks or hazards which would make the proposed urban rezoning of the Site's Northern Area unsuitable or inappropriate.

#### **S42A Report – Southern Area**

12. Initia have not been involved with the investigations for the southern area, however I have been provided with two reports prepared by Wiley Geotechnical Consultants:
  - *Geotechnical Investigation for proposed subdivision at 18A Black Swamp Rd, Mangawhai dated 8<sup>th</sup> November 2023*
  - *Geotechnical Investigation for proposed plan change at 18A Black Swamp Rd, Mangawhai dated 1<sup>st</sup> May 2024*
13. I have reviewed those reports and have considered their assessments and results in preparing this evidence.
14. A total of 50 handaugers have been carried out across the Site to a maximum depth of 3m. The Site has two distinct geological material types, alluvium in the low-lying areas adjacent to Black Swamp Rd and Pakiri Formation soils/weathered rock to south, where the landform increases in elevation.
15. Whilst the existing handauger investigation has not highlighted any major geotechnical hazards, I recommend that the Applicant undertakes deeper investigations to assess the liquefaction risk within the alluvium. I also recommend an assessment of the stability of the Pakiri Formation soils. This has also been noted by the Kaipara District Council

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<sup>2</sup> Cone Penetration Testing.

reviewer, Mr Sands. I agree that further investigations should be undertaken prior to development.

16. Notwithstanding the above, I conclude that if some deeper geotechnical hazards are identified within the Southern Area, these can be engineered out during the detailed design that will occur as part of the subsequent resource consent stage/s for land development. In my opinion, I consider that earthworks such as shear keys could be constructed to stabilise any marginal slopes in the Pakiri Formation soils and within the alluvium areas, and an adoption of a TC2 type raft foundation would alleviate any liquefaction concerns for future dwellings/buildings. Shear keys and other engineered structures are typical geotechnical design solutions.
17. The s 42A Report provides a recommendation of 3 options to resolve Mr Sand's outstanding geotechnical concerns.<sup>3</sup> The first option (which is the preferred option from my perspective) is for the Applicant to provide further geotechnical assessment prior to hearing.<sup>4</sup> I understand from discussions with the Applicant/owner of the Southern Area that they intend to undertake this additional work so that the detail can be provided before the plan change hearing in February 2026.
18. In my opinion, any geotechnical risk arising from potential liquefaction and landslip/mass movement risk within the Site's Southern Area can be managed through further detailed assessment and mitigated through appropriate design solutions such that the urbanisation of the Southern Area is suitable and appropriate.

## CONCLUSION

19. Given the geotechnical risks, are very similar across both the Northern and Southern areas of the Site, I consider that with some additional deeper investigation in selected locations, that these sites can be safely developed using a combination of earthworks and geotechnically engineered solutions to provide suitable foundations and appropriate levels of stability for the urban forms of development that the plan change proposes.
20. Consequently, I do not consider there is any geotechnical hazard risk that would mean the land should not be zoned as proposed.

**Andy Pomfret**

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<sup>3</sup> Section 42A Report at [85] – [87].

<sup>4</sup> Section 42A Report at [85]. I also note that this is Mr Clease's preferred option.