

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

SUPPLEMENTARY STATEMENT OF EVIDENCE OF CRAIG DAVIS ON BEHALF OF THE

APPLICANTS

(Coastal Hazards)

30 January 2026

Jeremy Brabant

Barrister

Level 7, 50 Albert Street, Auckland Central

PO Box 1502, Shortland St, Auckland 1140

M: 021 494 506

E: jeremy@brabant.co.nz

INTRODUCTION

1. My full name is Craig Jonathan Davis.
2. I prepared a Statement of Evidence dated 16 December 2025 on behalf of Foundry Group Limited (formerly Cabra Mangawhai Limited) and Pro Land Matters Company regarding an application for Private Plan Change 85 (**PC85**) under the Operative Kaipara District Plan 2013.
3. This evidence addresses the changes to National Direction that came into effect on 15 January 2026. The relevant change is the National Policy Statement for Natural Hazards (“NPS-NH”). In this supplementary statement I comment on the NPS-NH and the supplementary statement of evidence on behalf of Kaipara District Council prepared by Mr James Blackburn.

QUALIFICATIONS AND EXPERIENCE

4. I confirm that I have the qualifications and experience set out in my primary statement.

EXPERT WITNESS CODE OF CONDUCT

5. 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

6. I have provided professional advice as to the impacts , if any, of coastal processes on the land; the susceptibility of the land to coastal hazards and provided inputs to determine an appropriate zoning pattern with respect to the mapped extent of coastal hazards.
7. Our report, prepared to inform the plan change proposal, included recommendations for a coastal inundation overlay and a coastal erosion overlay, but otherwise

concluded that the land could be developed as per the proposed zoning pattern in a manner that would enable avoidance of coastal hazard risk.

SCOPE OF EVIDENCE

8. The National Policy Statement for Natural Hazards 2025 (NPS-NH) came into effect 15 January 2026.
9. Supplementary Evidence was provided by Mr James Blackburn on behalf of Kaipara District Council dated 23 January 2026.
10. My supplementary evidence addresses the influence of the NPS-NH on the coastal processes assessment for the site and the conclusions in Mr Blackburn's evidence.
11. As an overview, the potential Coastal Hazards of the site that have been considered are:
 - a. Inundation;
 - b. Erosion; and
 - c. Tsunami.
12. With regard to Inundation, a Coastal Inundation Overlay has been mapped, and forms part of the proposed planning maps, to highlight areas within the PC where further assessment will be required in relation to future development and coastal hazard risk. Subject to the recommendations of the Coastal report and the planning provisions contained within the proposed Mangawhai East Development Area provisions, I consider the development enabled by the PC suitably addresses risk due to Coastal Inundation.
13. With regard to Erosion, this is to be managed by ensuring development is set back sufficiently from the coastline. Offsets from MHWS have been specified in the PC provisions, to allow for future retreat of the shoreline. This provides a buffer to developable land, which in combination with yard requirements will keep all development outside the area potentially affected by the Erosion Hazard.
14. The threats from Tsunami are assessed as negligible, on the basis there is no recorded Tsunami damage to built development on record in Northern New Zealand.

RISK ASSESSMENT

15. The NPS-NH requires assessment of Coastal Hazards using a Risk Matrix.
16. The Policy Statement has 6 Policies that support the objective that *natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach*. We have assessed the proposal against these policies in Figure (Table) 1 below

No.	Policy	Comment
1	<i>...Risk level must be assessed using the risk matrix</i>	Risk level has been assessed using the risk matrix and results are shown below
2	<i>Natural hazard risk... managed... proportionate to the level of natural hazard risk</i>	Risk largely avoided by design and location of development. No further management required
3	<i>Very high natural hazard risks... avoided</i>	No very high risk assessed
4	<i>Significant natural hazards risk on other sites... must be avoided or mitigated</i>	Risk to other sites avoided
5	<i>Decisions must be based on the best available information...</i>	Latest sea level rise and hazard guidance used in risk assessment
6	<i>Potential impacts of climate change to at least 100 years...must be considered.</i>	100 year sea level rise considered.

Figure (Table) 1

17. The likelihood and consequence of the identified Coastal Hazards have been assessed in accordance with Tables 1 and 2, respectively, of the NPS-NH.

18. The outcome of the Assessment, as set out in Figure(Table) 2 is that any risk is Low

Hazard	Likelihood	Consequence	Risk
Inundation	Unlikely	Minor	Low
Erosion	Rare	Negligible	Low
Tsunami	Rare	Moderate	Low

Figure (Table) 2

19. The assessment undertaken and the conclusions are consistent with those set out in the Supplementary Evidence of Mr Blackburn. Of note:

- a. With respect to the assessment of coastal flood hazards (inundation):
 - i. The basis of assessment is that identified by Mr Blackburn at [3.2] – [3.3] of his supplementary evidence which is drawn from and relies upon my earlier detailed assessment report.
 - ii. We agree the likelihood of inundation is considered to be “unlikely” at most.
- b. Turning to the consequence of inundation, I conclude it is “minor”, based on minimum freeboard provisions limiting exposure of buildings to the design extreme event. Mr Blackburn concludes it is “minor” to “negligible”.
- c. We agree that overall the natural hazard risk associated with coastal inundation is “low”.
- d. With respect to the assessment of coastal erosion hazard:
 - i. We agree the likelihood of erosion is “rare”. The erosion management zone facing the estuary recommended in my earlier assessment (and incorporated in the proposed provisions) is a key management tool in this regard.

- ii. We agree for development outside of the identified erosion hazard overlay zones that the consequence of coastal erosion is “negligible”.
- iii. We agree that overall the natural hazard risk associated with erosion is “low”.

e. With respect to the assessment of tsunami hazard:

- i. Mr Blackburn identifies the basis for his assessment at [5.1] – [5.2] of his supplementary statement. I agree with that basis for analysis.
- ii. Mr Blackburn concludes with respect to tsunami likelihood that the appropriate probability is “unlikely” to “rare”. On the basis that the tsunami modelling is based on an event with a return period of 500 years, but due to the upper estuary location and narrow estuary mouth, my assessment is that the likelihood is “rare”.
- iii. Turning to consequence, my assessment is “moderate” while Mr Blackburn’s is “moderate” to “minor”.
- iv. We agree that overall the tsunami risk is “low”.

20. The risk of the Hazards are acceptable based on this assessment and my conclusions set out in my primary evidence remain unchanged.

Craig Davis

30 January 2026