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 EVAN PETERS ON BEHALF OF THE APPLICANTS

(Flooding)

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 Evan Alexander Peters.

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 Carey Senior.

QUALIFICATIONS AND EXPERIENCE

4. I confirm that I have the qualifications and experience set out in that 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 flooding on the land; and the susceptability of the land to flooding to determine an appropriate zoning pattern with respect to the mapped extent of flooding for this plan change.

7. I have prepared the stormwater management plan to support the plan change proposal. The report included a suite of stormwater solutions to support the plan

change. In addition my report adressed stormwater flooding impacts from the proposed development.

8. I concluded that due to the location of the site adjacent to a tidal zone that a "pass it forward approach" be adopted, where flows from the plan change area are discharged without peak flow mitigation as once flood waters enter tidal boundary, waters are naturally dispersed.

SCOPE OF EVIDENCE

9. The NPS-NH came into effect on 15 January 2026.

10. Supplementary Evidence was provided by Mr Carey Senior on behalf of Kaipara District Council dated 23 January 2026.

11. My supplementary evidence addresses the relevance of the NPS-NH on assessment of the Flooding risk for the site and the conclusions in Mr Senior's evidence.

12. My assessment of flood impact covers the likelihood of events occurring and the severity of these events on life, buildings and infrastructure.

RISK ASSESSMENT

13. The NPS-NH requires assessment of Flood hazards using the NPS-NH Risk Matrix - refer to Attachment 1.

14. 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.*

No.	Policy	Comment
1	…*Risk level must be assessed using the risk matrix*	Risk level has been assessed using the risk matrix, I refer to my attached memo for the assessment.
2	*Natural hazard risk… managed… proportionate to the level of natural hazard risk*	Risk mitigated due to open space zoning for flood susceptable land

		and avoiding development of urban activities in this area.
3	*Very high natural hazard risks… avoided*	No "very high" risk assessed.
4	*Significant natural hazards risk on other sites… must be avoided or mitigated*	Risk assessed as moderate to minor. Refer to Attachment 1.
5	*Decisions must be based on the best available information...*	Latest modelling information available along with coastal guidance around sea level rise, as outlined in my original evidence statement.
6	*Potential impacts of climate change to at least 100 years…must be considered.*	100 year flood scenario considered along with 100yr sea level rise considered.

Figure (Table) 1

15. The likelihood and consequence of the identified Flood Hazards have been assessed in accordance with Tables 1 and 2. Please refer to Attachment 1 which contains the assessment.

16. I conclude that the risk is moderate to minor in relation to flooding for the plan change.

17. The assessment undertaken and the conclusions are consistent with those set out in the Supplementary Evidence of Mr Senior.

18. The risk of the Hazards are acceptable based on this assessment and my conclusions set out in my primary evidence remain unchanged. There are no hazard risks that mean PC85 cannot be approved.

Evan Peters

30 January 2026

Memorandum

To: Burnette OConnor

From: Evan Peters

Date: 28/01/2026

Job No: 1838 – M3

NPS – NATURAL HAZARDS ASSESMENT – PPC85 MANGAWHAI EAST

I am pleased to attach my assessment against the National Policy Statement for Natural Hazards, December 2025.

The assessment is specific to flooding and stormwater for the PPC85 area. Please refer to Mr Davis evidence for coastal hazards.

The new NPS requires a risk assessment to be completed which covers the consequences and likelihoods of flooding events specific to the site and provides hazard rating for the activity in question.

Likelihood scenario

The concern focuses on larger flood events, in this case, I believe that the 2%-1% range is appropriate. Resulting in a "possible" likelihood level.

Table 1: Likelihood table

Likelihood level	Annual exceedance probability (AEP)	Average recurrence interval (ARI) or 'return period'
Almost certain	10% or more	Up to and including 10 years
Very likely	10% to 5%	Over 10 and up to and including 20 years
Likely	5% to 2%	Over 20 and up to and including 50 years
Possible	2% to 1%	Over 50 and up to and including 100 years
Unlikely	1% to 0.2%	Over 100 and up to and including 500 years
Rare	0.2% to 0.02%	Over 500 and up to and including 5,000 years
Very rare	Less than 0.02%	More than 5,000 years

Consequence scenario

The plan change area will create rezoned areas for urban development. However, areas adjacent to the stream, including the estimated flood extents in the 1% AEP event are proposed to be protected through an open space zoning.

Given the zoning, I consider the consequence to be "moderate" or "minor" as it is unlikely that any flooding will exceed the open space extents and impact the urban areas.

Table 2: Consequence table

Consequence level	Damage to property	Potential for injury or fatalities
Catastrophic	Severe damage to land and building(s), potential for collapse or total destruction of structures. Building(s) need to be demolished, rebuilt or relocated.	High threat to life safety, with probable fatalities and/or critical injuries.
Major	Major damage to land and building(s), including structural damage. Loss of use and substantial repair required.	Unsafe for people, with potential for many injuries, or critical injuries and/or fatalities.
Moderate	Some damage to land and non-structural damage to building(s). Limited loss of use, repairs required.	Unsafe for people, with potential for injuries, although expected to be minor.
Minor	Minor damage to land and building(s). No loss of use, minimal repairs required.	Isolated minor injuries possible.
Negligible	No loss of use, no building repairs required.	No injuries.

Risk Matrix result

Both Likelihood and consequence scenarios have been applied to the risk matrix table. The flooding aspects of the PPC85 result in a moderate to minor risk.

Figure 1: Risk matrix

Consequence Level	Likelihood Level						
	Almost Certain	Very Likely	Likely	Possible	Unlikely	Rare	Very Rare
ARI (years)	up to 10	10-20	20-50	50-100	100-500	500-5000	> 5000
AEP	10% or more	10% to 5%	5% to 2%	2% to 1%	1% to 0.2%	0.2% to 0.02%	< 0.02%
Catastrophic	Very High	Very High	Very High	High	Medium	Medium	Medium
Major	Very High	Very High	High	High	Medium	Medium	Medium
Moderate	High	High	High	Medium	Medium	Low	Low
Minor	Medium	Medium	Medium	Medium	Low	Low	Low
Negligible	Low	Low	Low	Low	Low	Low	Low

I concur with the Councils flooding expert, Mr Senior's supplementary evidence and believe this risk can be managed through the consenting process.

My evidence remains unchanged.

Regards

Evan Peters
Director, CPEng Civil
(1009452)