

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 (**PPC85**) -
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

REBUTTAL STATEMENT OF EVIDENCE OF ROBERT JAMES PRYOR ON BEHALF OF

THE APPLICANTS

(Landscape)

09 February 2026

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INTRODUCTION

1. My full name is Robert James Pryor.
2. I have previously prepared a statement of evidence dated 18 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 (**PPC85**) under the Operative Kaipara District Plan 2013.
3. This rebuttal evidence responds to matters raised in evidence on behalf of submitters, specifically, the evidence of Pamela and Allen Collinge who reside on Lot 2 DP 177202, between Black Swamp Road and the salt water wetland. Unless otherwise specified, my references to “submitters” in this statement are to Pamela and Allen Collinge.

QUALIFICATIONS AND EXPERIENCE

4. I confirm I have the qualifications and experience set out at paragraphs 1-3 of my statement of evidence dated 18 December 2025 (**statement of evidence**).

EXPERT WITNESS CODE OF CONDUCT

5. I repeat the confirmation provided in my statement of evidence that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code. I confirm that the issues addressed in this rebuttal evidence are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

SUBMITTERS CONCERNS

6. The submitters are concerned that if the change of zone is permitted they consider the potential for some of the sections within the proposed development to be a minimum of 350m² would result in lots which are too small, and such an outcome is not consistent with the rural nature of the area.
7. In my opinion, development enabled by PPC85 will influence the surrounding semi-rural land, reducing its rural quality. However, the area is a landscape in transition, with existing urban influences already present and PPC85 will result in a

comprehensively planned urban development, rather than sporadic and ad hoc development which has occurred in and around Mangawhai.

8. The Site and surrounding area are already highly modified, with existing residential, lifestyle, and mixed-use activities. The rural character does not display a high degree of "ruralness" due to the prevailing characteristics making the Site less sensitive to change.
9. While the existing rural character will be reduced, PPC85 includes measures to mitigate adverse effects, including ecological and riparian planting of the coastal edge, wetlands and stream banks, protection of natural features, coastal fringe enhancement and zoning for lower-density development along sensitive areas including the coastal edge.
10. The potential for 350m² sites applies only to the areas proposed to be zoned Residential – Medium Density and the provisions require resource consent for comprehensive development in order to achieve this density. In my experience comprehensive development proposals in locations such as this, would include a high quality of built form and a comprehensive approach to landscaping and shared outdoor spaces.
11. The predominant residential zoning proposed in the plan change is Residential Low Density, for which the proposed minimum site size is 750m². The Collinge's site is proposed to be Residential Low Density, as is the proposed zoning on the opposite side of Black Swamp Road to their property.
12. The NPS UD anticipates changes in character in areas where there is urban growth and the need to provide land to accommodate it. In my opinion the subject site and proposed zone layout responds well to the site and surrounding area and the driver for a comprehensive and well-planned approach to urban development.

CONCLUSION

13. In my opinion, the Mangawhai East Development Area provisions will maintain and enhance the landscape character of the Site's natural features, mitigate potential adverse landscape effects from development enabled by PPC85 on adjacent land and

the wider area, and ensure a suitable level of amenity and a well-functioning urban environment is achieved.

Rob Pryor

09 February 2026