

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

**REBUTTAL STATEMENT OF EVIDENCE OF ROBERT JAMES HAMILTON WHITE ON
BEHALF OF THE APPLICANTS
(Water and Wastewater)
09 February 2026**

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INTRODUCTION

1. My full name is Robert James Hamilton White.
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 (**PC85**) under the Operative Kaipara District Plan 2013.
3. This rebuttal evidence responds to matters raised in expert evidence on behalf of submitters. Specifically relating to wastewater infrastructure.

QUALIFICATIONS AND EXPERIENCE

4. I confirm I have the qualifications and experience set out at paragraphs 2-3 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.

SCOPE OF EVIDENCE

6. My rebuttal evidence will cover:
 - a. Riverhead Holiday Park infrastructure wastewater infrastructure.
 - b. Supplementary Statement of Evidence of Jonathan Guy Cleese, Planning

MARK ANDREW ROSS FOR RIVERSIDE HOLIDAY PARK 2007 LIMITED

7. The comment (Item 2.5 (a)) *"The site is not provided with any connections to Kaipara District Council Infrastructure. While there is a connection to public wastewater, RHPL*

funded its installation with a legal agreement in place that provides for their priority and an agreed number of connections” is noted.

8. As a point of clarification, the proposed wastewater infrastructure for the plan change area has been designed as a totally standalone system up to connection to Kaipara District Council’s (KDC’s) Longview Street Wastewater Pump Station (PS-VA).
9. There is no proposal to connect to the existing Riverhead Holiday Park infrastructure, nor utilise their agreed number of connections.
10. The proposed wastewater infrastructure could also be designed to accept flows from lots within Windsor Way, adjacent to the Riverside Holiday Park, and the Riverside Holiday Park itself, if deemed advantageous to Council or these landowners.
11. The proposed wastewater infrastructure includes a separate rising main across the estuary, that could potentially be constructed as part of the proposed shared path adjacent to the Insley Street causeway/ bridge.

SUPPLEMENTARY STATEMENT OF EVIDENCE OF JONATHAN GUY CLEAVE

12. I note the comment (Item 5.4) *“Of relevance to PPC85, the amendments to the NZCPS provide a more enabling policy framework against which any future application for resource consent for the shared path adjacent to the Insley Street causeway/ bridge will be assessed (as transport infrastructure within the CMA). The design and consenting of the shared path will necessarily remain subject to a detailed assessment of effects. The NZCPS amendments however assist in improving confidence that this key piece of infrastructure for PPC85 is capable of being consented by providing policy recognition of it being within the ambit of the activities that are recognised in the NZCPS as being able to be located within the CMA. The shared path is ‘infrastructure’, it has a clear functional need to be within the CMA adjacent to Insley Street as a necessary connecting route, and it is related to the social, economic and cultural well-being of people and communities”.*
13. Construction of the shared path adjacent to the Insley Street causeway/ bridge provides a route for the proposed rising main between the proposed wastewater pump station and Longview Street Wastewater Pump Station (PS-VA).

14. This provides *“Improv[ed] confidence that this key piece of infrastructure for PPC85 is capable of being consented”*.

CONCLUSION

15. The proposed wastewater upgrades do not utilise the Riverside Holiday Park number of wastewater connections. The proposed upgrades provide Council with alternative servicing options for existing developments east of the estuary.
16. I understand that amendments to the NZCPS provides greater confidence that the shared path adjacent to the Insley Street causeway/ bridge can be consented, with the pathway providing a potential route for the rising main between the proposed wastewater pump station and KDC’s Longview Street Wastewater Pump Station (PS-VA).



Robert James Hamilton White

09 February 2026