

**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

---

**STATEMENT OF EVIDENCE OF JACKSON WORSFOLD ON BEHALF OF PRO LAND**

**MATTERS COMPANY LIMITED (APPLICANT)**

**(Corporate)**

**9 February 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](mailto:jeremy@brabant.co.nz)

## **INTRODUCTION**

### **QUALIFICATIONS AND EXPERIENCE**

1. My full name is Jackson Worsfold.
2. I hold the qualifications of a Bachelor of Resource Studies Majoring in Policy and Planning from the University of Lincoln.
3. I have over 20 years' experience as a planner and have been the development manager for Pro Land Matters Company for 10 years. During this time I have been involved in a wide range of land development projects.
4. Until its sale in 2023, I was the Director of Dream Planning Limited (established in Mangawhai in 2005), a multi-disciplinary development consultancy providing planning, landscape architecture, project management and architectural design services.
5. My background in planning, including operating a planning consultancy and being directly involved in development projects, gives me a practical appreciation for the balance between enabling growth and meeting community needs. I am passionate about fostering development that respects local heritage, reinforces Mangawhai's distinct character and landscape, and enhances the quality of life for current and future residents.
6. I have lived and worked in the Mangawhai area for most of my life and my family, of which I am fifth generation, has a long-standing commitment to the local community.

### **EXPERT WITNESS CODE OF CONDUCT**

7. Although this is not a hearing before the Environment Court and this evidence is not expert evidence, 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.

## **SCOPE OF EVIDENCE**

8. The purpose of my evidence is to provide corporate evidence on behalf of Pro Land Matters Company Limited ("Pro Land") in relation to Private Plan Change 85 ("PPC85").
9. My evidence will address the following:
  - a. Background & Vision.
  - b. Comments on matters raised in public submissions.
  - c. Comments on matters raised in Section 42A Report.
  - d. Concluding comments.

### **Background & Vision**

10. Pro Land is an emerging real estate development firm based in Mangawhai. Our vision is to elevate the standard of development in the region through a design-driven approach. We are committed to delivering projects that balance commercial viability with positive social, economic, and environmental outcomes. An example relevant to Mangawhai is our recently completed 40 lot subdivision 'Whai Awa' at William Gilbert Drive in Mangawhai Village (**Appendix 4**).
11. Pro Land acquired 18 Black Swamp Road in January 2021 due to its unique strategic location and natural attributes. The site is positioned near Mangawhai Village, Mangawhai school, the Harbour, and Pacific Road Beach, providing access to various coastal and world-class recreational amenities. Additionally, it features a northerly aspect with exceptional views of Mangawhai's key attractions: the harbour, Brynderwyns, sandspit dune system and the Pacific Ocean.

12. The subject site, along with the Foundry site and several surrounding parcels, offers a substantial undeveloped area characterized by varied topography, northern exposure, along with estuary and ocean views. This presents a rare opportunity for a cohesive, high-end master-planned approach to development. Particularly given there are not many large parcels of land like this situated within such a strategic location.
13. Since acquisition, our team has conducted extensive site, GIS and context analysis to evaluate the land's capabilities. This work underpinned and confirmed the site's already obvious unique qualities and attributes. Understanding land characteristics and capability is vital for effective development design, as it ensures that projects align with environmental, social, and economic factors. This knowledge helps optimize land use, enhances sustainability, and ultimately supports the long-term success of the development.
14. Spatially, the Black Swamp area is a logical extension and strategic node for further development in Mangawhai as was identified in the options analysis for the Mangawhai Spatial Plan.
15. Rather than defaulting to conventional residential subdivision with limited integration or design coherence, we are pursuing a master-planned approach that enables a mix of housing typologies supported by a small-scale, village-style centre offering local services and amenities.
16. While the site could feasibly support a lifestyle-oriented development, this model is already well represented in the local area through high-end projects such as Tern Point, Tara Iti, and Te Arai Links. Pro Land has also already secured a resource consent for a cluster of 20 lifestyle type allotments (**Appendix 2**) but the more optimal land use for the overall site is reflected in the plan change proposal and our intention is to deliver a development of high quality that offers a more diverse and inclusive outcome — one that reflects the site's proximity to the village centre and responds to the evolving settlement pattern of Mangawhai.

17. An integrated development with a neighbourhood centre and varied housing typologies offers significant advantages over conventional subdivisions. It fosters community cohesion by providing diverse housing options, attracting a mix of residents and encouraging social interaction. The proximity of amenities—such as shops, parks, and services—promotes walkability, reducing reliance on cars and enhancing convenience. This design not only contributes to the existing local economy but also leads to increased property values and sustainable living practices. Overall, such developments create healthier, more connected communities that can adapt to future growth and changing needs.
18. The plan change proposal presents an opportunity to contribute to the strategic and managed growth of Mangawhai while safeguarding the character of this part of the district from further fragmentation and disorganized development over time.
19. The plan change provides an opportunity for a comprehensive approach that combines residential, commercial, ecological enhancement and recreational spaces, fostering a connected and vibrant community. A well-planned development in this area will mitigate the risks of piecemeal, disjointed growth that would likely occur due to demand for coastal / estuary side living and the proximity of this land to the Village, ensuring that development is cohesive and strategically aligned with existing infrastructure.
20. There has been much discussion that the proposal does not align with the Mangawhai Spatial Plan (“**MSP**”). However, at the time we purchased the land the MSP had identified the PPC85 area as one of seven potential residential growth areas. This made sense given the site’s strategic location and considerable attributes. The PPC85 area is identified as potential residential growth Area G in Appendix C of the MSP and ranked as overall third in terms of practical suitability for residential development.
21. The Mangawhai Spatial Plan (MSP) identified Areas A and D as the most suitable for future residential development, and these areas have since been zoned

accordingly – PC83 The Rise and PC84 Mangawhai Hills. However, in my view, this assessment did not sufficiently account for the relative development potential of other areas, particularly Area G, which demonstrates significantly stronger site characteristics. Areas A and D are constrained by steep topography and a predominantly south-facing aspect, limiting their practical suitability for walkable, well-integrated neighbourhood outcomes. The MSP's approach appears to have favoured linear extension of existing zones over a more nuanced assessment of landform, aspect, amenity, practical connectivity and development feasibility.

22. Given that the Plan Change area (Area G) was identified as the third most suitable location for residential growth in the Mangawhai Spatial Plan, I consider it important that this land is prioritised for a coordinated, master-planned development outcome. Without this, there is a significant risk that the area will continue to fragment through ad hoc countryside living and low-yield subdivision, undermining the opportunity for a strategically planned neighbourhood now and in the future.
23. Mangawhai is now one of New Zealand's fastest-growing coastal settlements. Since the MSP was adopted, key contextual changes — including the application of the National Policy Statement on Urban Development (NPS-UD) to Kaipara and the announcement of the Northern Motorway extension — have further elevated the strategic importance of this site. These factors do not appear to have been adequately considered in the Council's processing of PPC85 and were not in play at the time the MSP was prepared.
24. With over two decades of experience in land development across Mangawhai and the wider Kaipara District, I have consistently observed the consequences of a piecemeal / ad hoc and reactive planning approach. Much of this stems from outdated or inflexible district planning frameworks that have struggled to anticipate or respond to the area's rapid growth and wider external influencing factors like the motorway extension, for example. In my view, there has been a systemic lack of coordinated responsive long-term planning in the Mangawhai and wider area, to manage growth and related urban expansion. The results have been poorly planned infrastructure and extensive ad hoc rural residential development.

These development outcomes do not enable well-integrated, high-quality development outcomes.

25. The context plan attached in **Appendix 3** provides a clear illustration of what has occurred around the periphery of the PPC area and reflects the broader pattern of ad hoc development that has occurred in Mangawhai over the last 25 years. Not allowing this Plan Change to proceed risks further fragmentation of rural land, ad hoc development, and inefficient land use. This would waste the site's natural advantages, its practical connectivity, and miss the chance for comprehensive development that strategically supports the managed growth of Mangawhai.
26. The ongoing development of Mangawhai is dynamic not static and must continue to evolve to meet the growing demand for housing and diverse housing typologies from an increasing population seeking to live and work here.
27. The growth of Mangawhai has consistently been underestimated, particularly over the past decade. In my view, this reinforces the need for a more coordinated and long-term approach to planning—one that moves beyond the traditional 10-year horizons typically relied upon under the Resource Management Act. I understand that the NPS Urban Development requires a longer-term view over a 30-year horizon<sup>1</sup> and the Government has discussed extending the 30-year horizon further to say a 50-year planning horizon. This need is heightened by the confirmed extension of the Northern Motorway, which is expected to place a direct off-ramp within a 10-minute drive of Mangawhai Village. Such infrastructure will significantly increase accessibility and development pressure, further highlighting the importance of proactively identifying and enabling suitable and sufficient areas for growth now.
28. Through this proposal, and in collaboration with Foundry Group, we recognise a timely opportunity to address historical gaps in planning and deliver a well-

---

<sup>1</sup> NPS UD – Definition of long term is 10 to 30 years.

connected, comprehensively planned neighbourhood that reflects contemporary best practice and community needs.

29. Attached as **Appendix 1** is a development concept plan set for Stage 1 of our project, which, as noted above, has already been consented (except for Lots 20 – 23 which would be a future stage) under the Operative District Plan. While approved under the existing planning framework, the proposed density and layout for the more elevated sites (Lots 1-6 and 13-15) are consistent with the zoning and development provisions of the proposed plan change. This stage reflects the creation of larger lots located on the more elevated parts of the site, providing a transition in intensity that integrates naturally with the established pattern of peri-urban lifestyle development in the southern part of the plan change area. This zoning pattern and landscape design underpins a deliberate approach to managing interface conditions and responds to topography and coastal setting.
30. Our overarching objective is to ensure that this area is comprehensively and thoughtfully planned, enabling it to integrate seamlessly into the wider Mangawhai settlement. This approach contrasts with the risk of the land devolving into a patchwork of isolated subdivisions, disconnected from each other and from essential infrastructure, services, and community amenities. In our view, there is a critical timing consideration. If this Private Plan Change does not proceed, the likely fallback position is further rural lifestyle development, which would permanently preclude the opportunity to realise the benefits of a coordinated, master-planned neighbourhood.

#### **Comments on matters raised in public submissions**

31. Collectively as a group we have implemented various consultation strategies to engage with the community and specific community groups and iwi, including two open days, email, telephone calls, meetings and on-site meeting requests.
32. The level of engagement throughout the plan change process has been varied. In some instances, we encountered groups with a predisposed opposition to development, which made it difficult to establish a shared understanding of the

proposal's intent and potential benefits. While we acknowledge the right to differing views, we had hoped for a more collaborative and constructive dialogue focused on achieving balanced outcomes aligned with the wider community's long-term aspirations.

33. Conversely, we have also received a great deal of positive feedback, particularly in support of the proposal's master planned approach and the emphasis on proactively managing growth over the medium to long term. Much of this support has come from younger residents and families who see well-planned development as essential to securing housing opportunities, supporting social infrastructure which in turn will support economic resilience, enabling residents to live and work within the Mangawhai area.
34. I find it perplexing that this and other recent Private Plan Change requests that are comprehensively planned have received such significant and public opposition from members of the public, community groups and some elected members. This is particularly so given the ongoing proliferation of small-scale, often non-complying subdivisions across the District, especially in the Mangawhai catchment, which tend to proceed with limited strategic oversight or integration. These fragmented developments result in hundreds of sites and are rarely subject to the same level of scrutiny, despite their cumulative impact on infrastructure, character, and long-term planning outcomes.
35. While concerns regarding infrastructure and amenity infrastructure pressure are valid, this has always historically been an issue for Mangawhai, necessitating innovative solutions and highlighting the importance of a longer term vision to planning and urban development. It is disappointing that the focus is not on addressing these challenges.

#### **Comments on matters raised in Section 42A Report**

36. I consider it regrettable that a site visit was not undertaken by the Council during the assessment of this application. While officers may be generally familiar with

the locality and have no doubt viewed the site from public places, there is significant value in experiencing the specific characteristics of a site in person. The topography, outlook, context, and spatial relationships cannot always be fully appreciated through desktop assessment or views from the road. A site visit provides important context for understanding the proposal and the opportunities it presents. In the absence of such engagement, there is a risk that assessments may not fully reflect the site's qualities or potential, which I believe is a missed opportunity to inform sound and responsive decision-making.

37. Our evidence clearly demonstrates that the issues raised in the Council's s42A report have been thoroughly addressed, particularly concerning infrastructure and the perceived growth rates associated with Mangawhai. We have provided comprehensive data and analysis that illustrate the current capacity of existing infrastructure to accommodate anticipated development overtime, thereby alleviating concerns regarding its adequacy. Furthermore, we have conducted a detailed assessment of growth trends, which indicates that the projected growth rates are consistent with long-term planning objectives and can be managed effectively.
38. Although not referenced in the Section 42A report or Council's economic assessment, the Warkworth to Te Hana motorway construction is imminent, and the northern extension is progressing toward reality. NZTA has already entered discussions with our family regarding potential routing through the centre of our farm, located just 10 kilometres west of Mangawhai. This infrastructure project will dramatically enhance regional connectivity and reduce travel times, positioning Mangawhai within even easier reach of Auckland and surrounding centres. The implications of this motorway are highly relevant to strategic planning decisions and cannot be overlooked. Combined with Mangawhai's recent development momentum and the international recognition of its golf courses, this improved access is expected to further accelerate growth in the area.

## **CONCLUSION**

39. The Plan Change area is regarded as a highly desirable location. If approved, the plan change will promote and deliver a more strategically managed growth outcome for Mangawhai by establishing a comprehensively planned approach to the development of the area over time.
40. Having lived in the area for many years, I can assure you of my commitment, on behalf of Pro Land, to delivering this proposal to the highest standards of quality and design if it is approved.
41. Furthermore, I confirm that the latest amendments to the proposal reflect Pro Land's dedicated efforts to address the concerns raised by submitters and the most recent Council Section 42A Report.

---

**Jackson Worsfold**

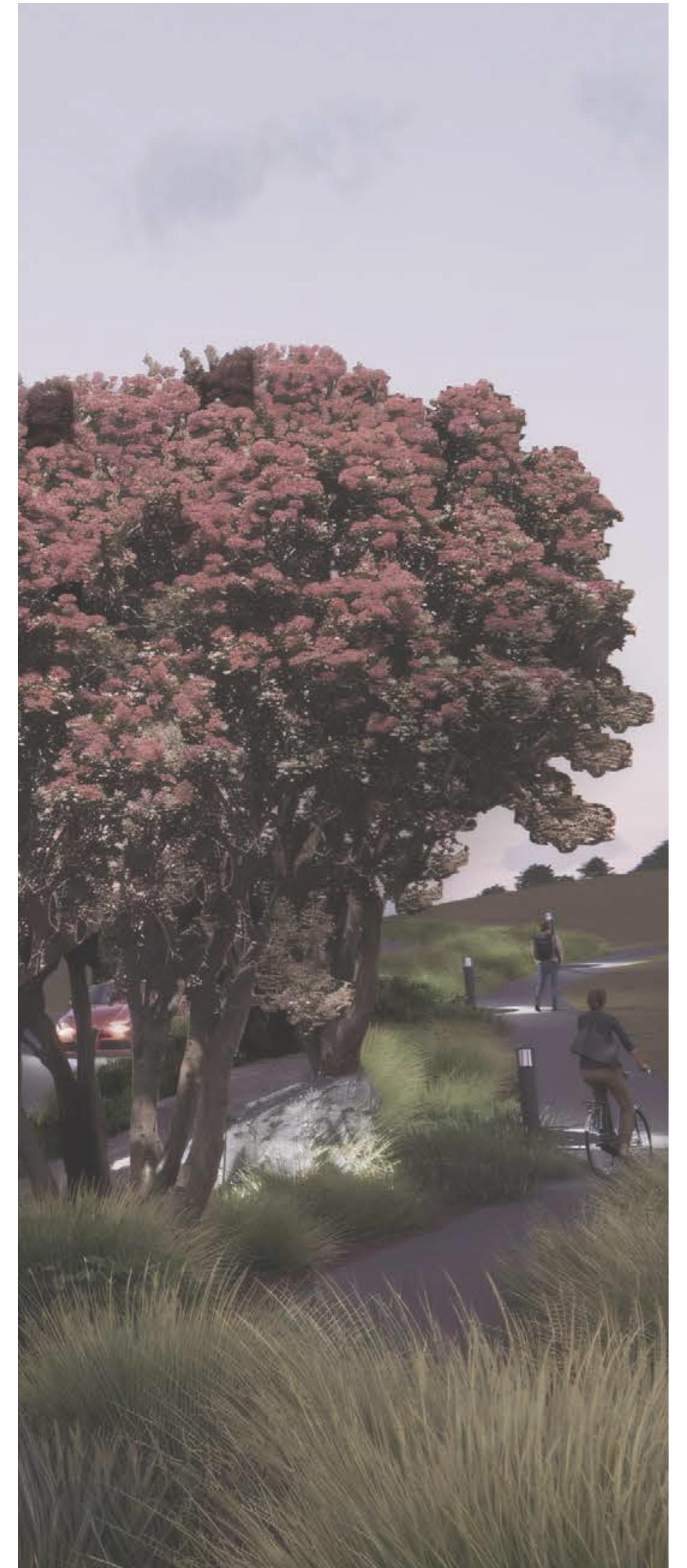
**9 February 2026**

**Attachments:**

A. Appendices 1 - 4

# **Appendix 1:**

## **Development Concept**



## 18 Black Swamp Road

---

### Landscape Design

# Contents

---

Site Plan	3
Stage 1 Plan	4
Road Corridor Sections	5
Entry Plan	6
Intersection Plan	7
Boardwalk Plan	8
Lighting Plan	9
3D Views	10-12





## Design Notes

- 600m<sup>2</sup> building platform, staggered where practical, to improve privacy and views to the north.
- Driveway access points are indicative only. These need to be considered in conjunction with the engineers roading earthworks. Note, retaining walls to create driveways is not ideal. Battered slopes with coastal planting preferred.
- Large chamfers on the title boundary of Lots 9 and 10, allows for footpath to be pulled away from the intersection and enable large clusters of trees and landscaping. This additional space also allows for better integration and screening of infrastructure elements, such as transformers.

## Streetscape Notes

- Retain pohutukawa tree on the right upon entering. Add more large specimen tree planting on path sides to create a heavily landscaped entry, with a presence.
- Footpath to be located on the right or western side of the road, to ensure cars have safe movement at the entry. A planted landscape swale creates a strong physical separation from the road.
- Pedestrian crossing to access future coastal walkway linear park.
- Proposed 'linear park' on north side of main road. Grass swale extending into generous grass berm with meandering footpath and tree clusters. Future on-street parking can be incorporated, as required, for further development stages.
- Footpath to be on inside of loop road for ease of construction and proximity to lots.
- Nodes of planting intensification to occur on intersections and where central gully planting comes down and crosses the road.
- A proposed boardwalk treatment set amongst sub tropical planting gives the pedestrian experience a nice coastal vibe.

## 18 Black Swamp Road Site Plan

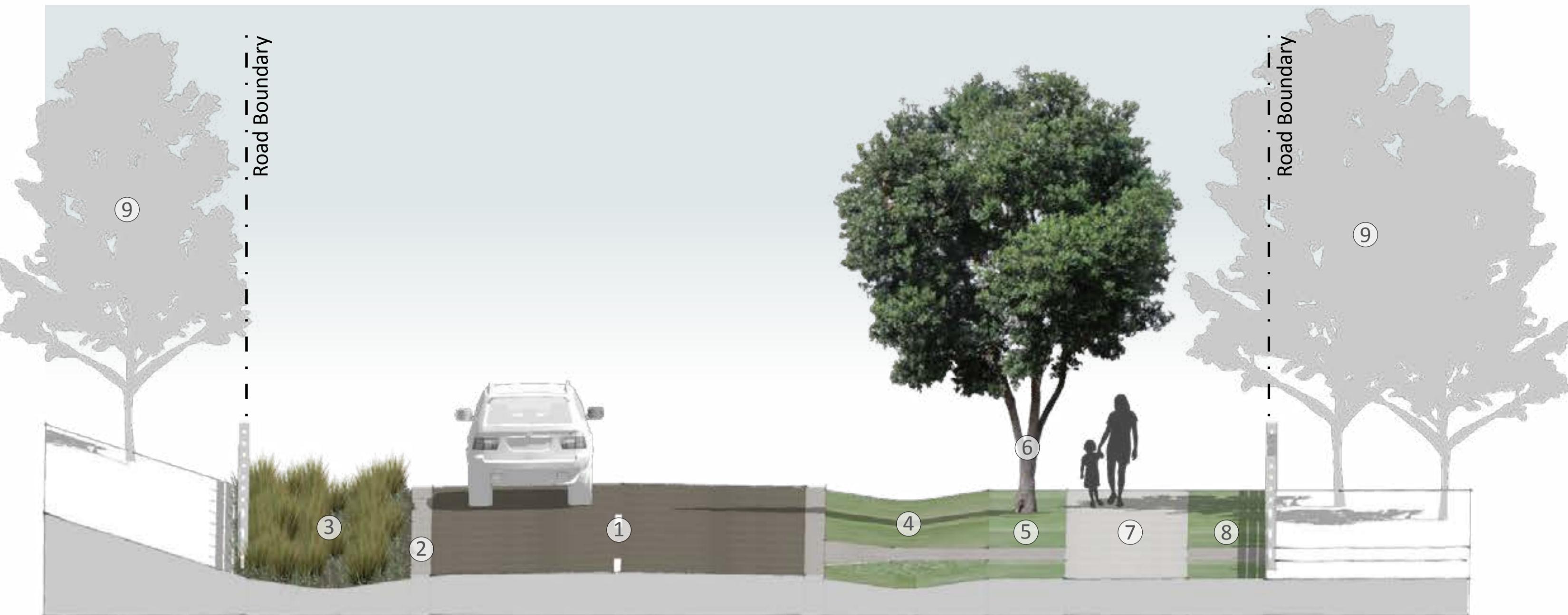
Scale 1:1000@A1  
Date 06.10.2025  
Rev C



**18 Black Swamp Road**  
Site Plan- Stage 1

Scale 1:1000@A1  
Date 06.10.2025  
Rev C





Section A - Road 2

## Section A

15m road corridor

- ① 5.5m wide carriageway crowned. Asphalt finish.
- ② 0.3m concrete flush nib kerb on both sides - acid wash finish.
- ③ 2.4m wide planted swale.
- ④ 2.4m wide grass swale.
- ⑤ 1.15m wide grass verge.
- ⑥ Street trees within grass verge at property corners to create informal clusters to tie in with coastal planting pattern. Uniform streets tree planting to be deleted.
- ⑦ 1.8m wide footpath - exposed aggregate finish.
- ⑧ 1.15m wide grass verge for services.
- ⑨ Indicative boundary treatment- Specimen tree planting within lots to provide amenity and 'scale' to the streetscape environment. Clusters on property corners, see plan for locations.



Section B - Road 1

## Section B

20m road corridor

- ① 6.5m wide carriageway crowned. Asphalt finish.
- ② 0.3m concrete flush nib kerb on both sides - acid wash finish.
- ③ 3m wide planted swale.
- ④ 1.8m wide footpath - exposed aggregate finish.
- ⑤ 3m wide grass swale.
- ⑥ 4.1m wide grass verge.
- ⑦ Street trees within grass verge clustered around intersections.
- ⑧ Indicative boundary treatment .



Section B (Widened) - Road 1

## Section B (widened)

24m road corridor

- ① 6.5m wide carriageway crowned. Asphalt finish.
- ② 0.3m concrete flush nib kerb on both sides - acid wash finish.
- ③ 3m wide planted swale.
- ④ 1.8m wide footpath - exposed aggregate finish.
- ⑤ 3m wide grass swale.
- ⑥ 8.1m wide grass verge, 'lineal park' includes - landscape treatment, lighting and integrated on street parking if required .
- ⑦ Street trees within grass verge clustered around intersections.
- ⑧ 1.8m wide footpath to meander through lineal park - exposed aggregate finish.
- ⑨ Indicative boundary treatment.

## 18 Black Swamp Road

Road Sections

Scale NTS  
Date 06.10.2025  
Rev C

## Key

- ① Existing Pohutukawa tree on embankment on the right-hand side upon entering to be retained
- ② 6.5m wide asphalt road 1. 0.3m wide flush concrete nib each side. Acid wash finish
- ③ Stone threshold. Flush basalt crazy pave with 0.3m wide flush concrete nib each side. Acid wash finish
- ④ Large basalt slabs at each side of entry threshold
- ⑤ 1.8m wide concrete foot path. 1/4 black oxide, exposed aggregate finish
- ⑥ Low coastal planting
- ⑦ Specimen trees



## 18 Black Swamp Road

### Entry

Scale 1:100@A1  
Date 06.10.2025  
Rev C



## Key

- ① 6.5m wide asphalt road 1, 5.5m wide asphalt road 2. 0.3m wide flush concrete nib each side. Acid wash finish
- ② Stone rumble surface on inside radius of all corners. Outer edge to be deconstructed and 'merge' into planted corners / swales. Acid wash finish
- ③ Concrete surface at intersections. 1/2 black oxide, exposed aggregate finish
- ④ 1.8m wide concrete foot path. 1/4 black oxide, exposed aggregate finish
- ⑤ 2.5m wide pedestrian crossing points. Concrete surface at intersections. 1/2 black oxide, exposed aggregate finish. 0.5m centre saw cuts.
- ⑥ 3 x street lights on intersections.
- ⑦ Area between footpath and adjacent property boundary for any services such as transformers to be placed amongst planting.
- ⑧ Low coastal planting
- ⑨ Specimen trees

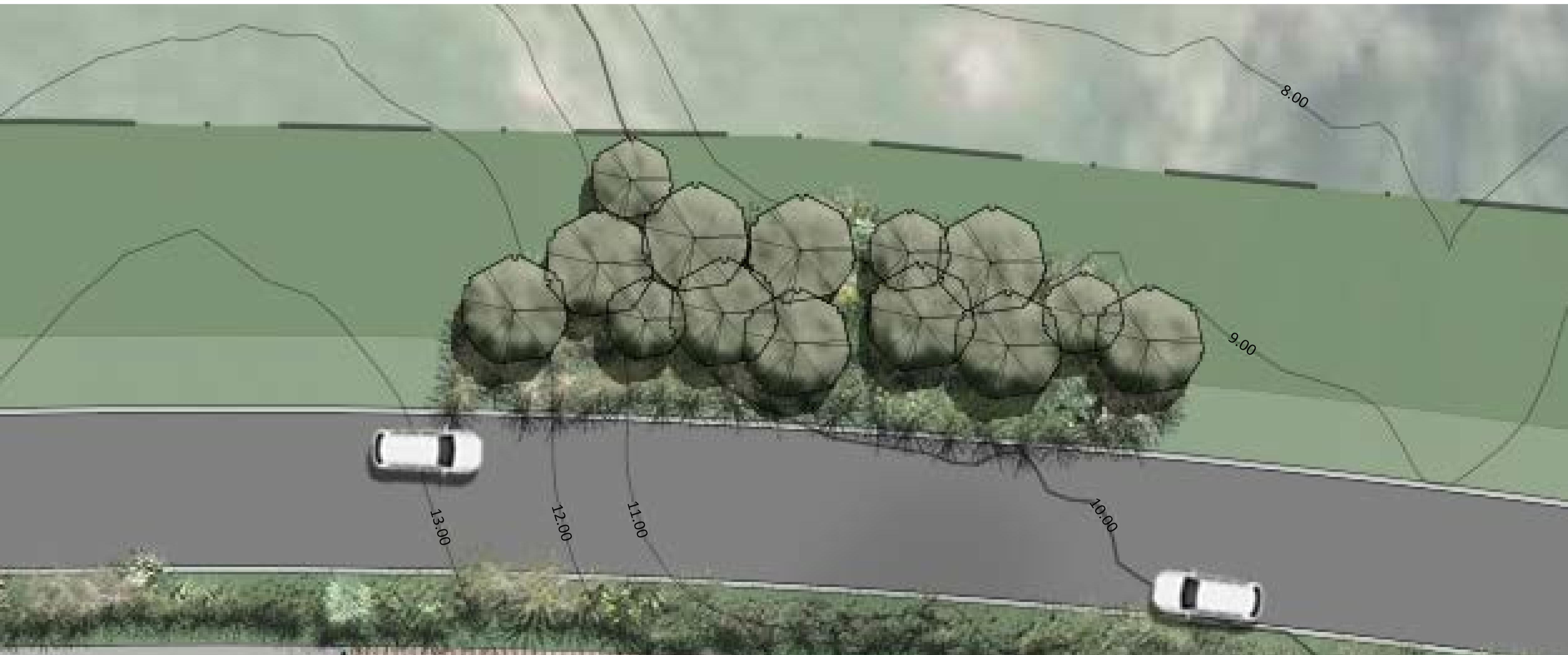


## 18 Black Swamp Road

### Typical Intersection

Scale 1:100@A1  
Date 06.10.2025  
Rev C





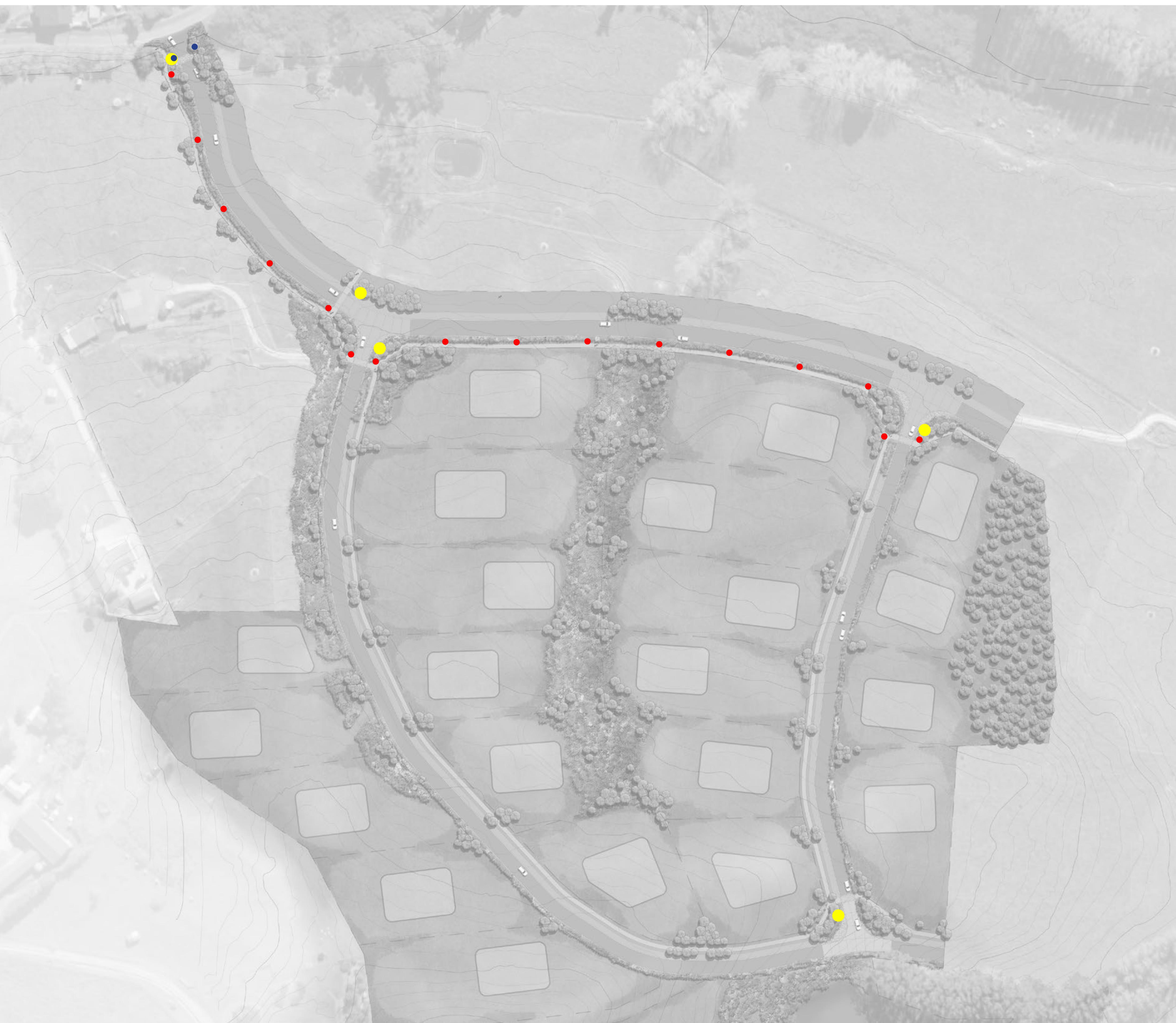
### Key

- ① 6.5m wide asphalt road 1. 0.3m wide flush concrete nib each side. Acid wash finish
- ② 1.8m wide concrete foot path. 1/4 black oxide, exposed aggregate finish
- ③ 1.8m wide hardwood board walk.
- ④ Area between footpath and adjacent property boundary for any services such as transformers to be placed amongst planting.
- ⑤ Low coastal planting
- ⑥ Specimen trees



**18 Black Swamp Road**  
Boardwalk

Scale 1:100@A1  
Date 06.10.2025  
Rev C



### Key

- Yellow circle: 5 Street lights. Lighting only the intersections. 3 x lights on Road 1 intersections. 1 x light on road 2 intersection. 1 x light at the entry.
- Red dot: 16 x Bollard lighting. Nominal 30m spacing.
- Blue dot: 2 x garden spike lights to surface light entry threshold / feature

## 18 Black Swamp Road

### Lighting Plan

Scale 1:750@A1  
Date 06.10.2025  
Rev C





18 Black Swamp Road  
3D View- Entry



18 Black Swamp Road  
3D View- Entry (night)



**18 Black Swamp Road**  
3D View- Intersection

# **Appendix 2:**

## **Approved Scheme Plan**



#### KEY

- Proposed Boundary
- Neighbouring Property Boundaries
- Existing Building
- Potential House Location

#### PROTECTED VEGETATION

- Protected Vegetation Areas by the way of Consent Notice

AMALGAMATION CONDITION (condition that land be held in the same ownership)

LOT 100 & LOT 300 DP... BE HELD IN THE SAME RECORD OF TITLE

ADDRESS  
18 BLACK SWAMP ROAD, MANGAWHAI  
CLIENT / APPLICANT  
PRO LAND MATTERS COMPANY LTD.

PROPOSAL  
PROPOSED SUBDIVISION OF  
SECTION 25 BLOCK IV MANGAWHAI SURVEY DISTRICT &  
LOT 2 DP 29903 / NA 1323/43 AT  
18 BLACK SWAMP ROAD, MANGAWHAI  
SITE AREA  
30.7839 Ha

DISCLAIMER  
THE INFORMATION SHOWN ON THIS DRAWING IS FOR THE SOLE PURPOSE OF  
SUPPORTING A SUBDIVISION CONSENT APPLICATION UNDER THE RESOURCE  
MANAGEMENT ACT 1991 TO KAIRARA DISTRICT COUNCIL. THE INFORMATION  
MUST NOT BE USED FOR ANY OTHER PURPOSE. AREAS AND MEASUREMENTS  
ARE SUBJECT TO KAIRARA DISTRICT COUNCIL AND LINZ FINAL APPROVAL.  
THE VERTICAL DATUM FOR THE LIDAR CONTOUR (1M) IS OTP64 V2 AND IS  
PROJECTED TO THE NZGD 2000 NEW ZEALAND TRANSVERSE MERCATOR  
COORDINATE SYSTEM (NOT SURVEYED).

#### SCHEME PLAN AERIAL

SCALE 1:2500 @ A3



A3

DRAWN BY

EE

REF / VERSION #

20683 - SCA

RM 230111

DATE

14 / 05 / 2024

SHEET

**HORIZON**  
SURVEYING | LAND DEVELOPMENT | PLANNING  
ARCHITECTURE | LANDSCAPE ARCHITECTURE

4 WOOD STREET, MANGAWHAI HEADS  
WEB www.hslsd.nz

PHONE 09 431 45 68

2.3

# **Appendix 3:**

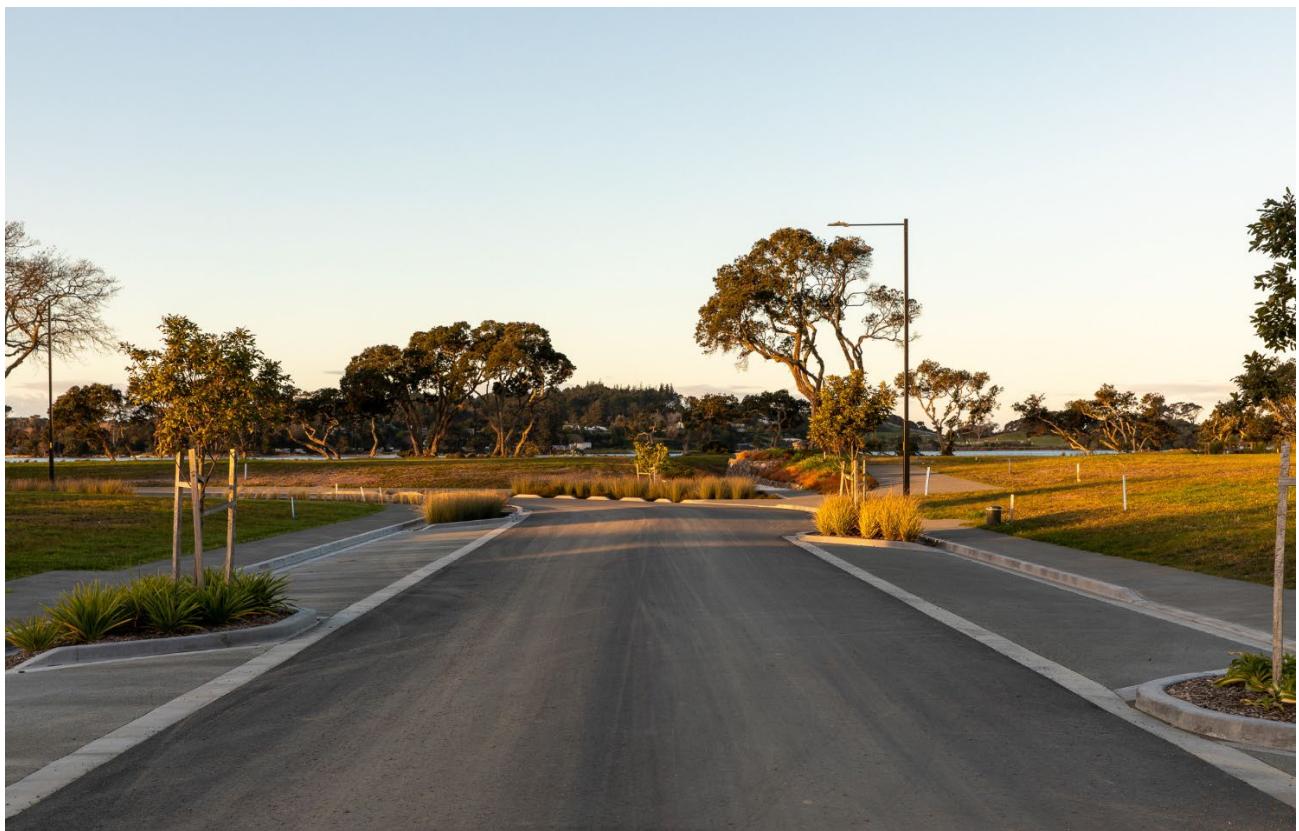
## **Context Plan**



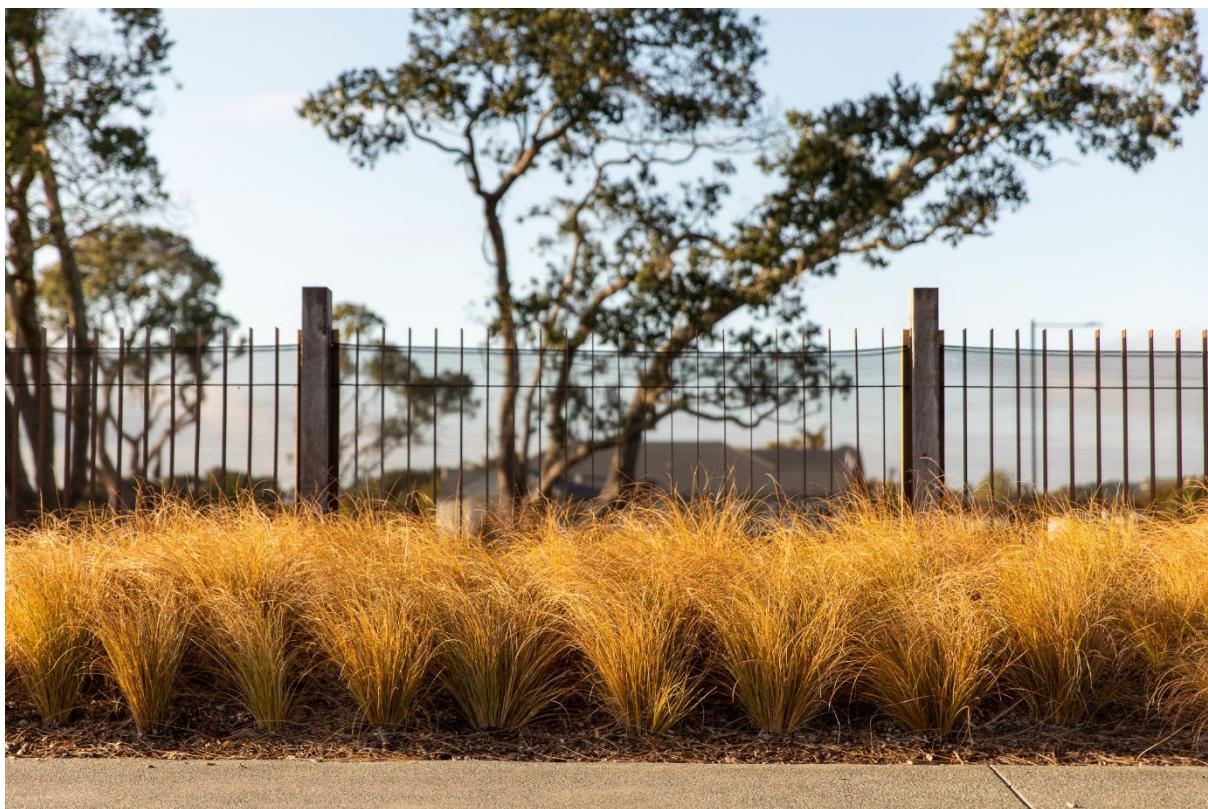
## **Appendix 4:**

### **Whai Awa – William Gilbert Drive, Mangawhai**

## WHAI AWA – MANGAWHAI VILLAGE



## WHAI AWA – MANGAWHAI VILLAGE



## WHAI AWA – MANGAWHAI VILLAGE

