

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

**HEARING SUMMARY OF EVAN ALEXANDER PETERS ON BEHALF OF THE
APPLICANTS**

(FLOODING AND STORMWATER)

17 February 2026

Jeremy Brabant

Barrister

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Summary

1. I prepared a Stormwater Management Plan for the PPC85 application, which outlines key stormwater criteria specific to the PPC85 catchment and provides a framework for solutions which can be employed as part of future Resource Consent applications.
2. Due to the PPC85 location in the catchment, the SMP concludes that stormwater is to be treated from contaminate generating surfaces prior to discharge and that a “pass it forward approach be adopted” for larger storm events.
3. The “pass it forward” approach is where larger storm events are conveyed directly to the coastal edge. This allows stormwater to dissipate quickly to the coastal environment where no downstream properties are located. In my experience this is the optimal and industry accepted best practice for sites such as the subject plan change land area.
4. Mr Senior agrees with the assessment of stormwater effects and that the Stormwater Management Plan is appropriate to support the PPC85 approval.
5. I agree with Mr Senior’s rebuttal in response to Mr Westwood’s argument that site specific hydraulic analysis be completed at time of Plan Change.
6. Developed designs are not being assessed at Plan Change stage and providing detailed hydraulic assessment is inappropriate where these elements are not yet designed i.e. we do not yet know what activities etc will be established on the land.
7. I agree with Mr Senior’s comment, point 4.5 “Mr Westwood’s concern that the proposal will displace flood storage or increase downstream flood risk is unsupported by the catchment context”.
8. The development is located within the lowest reaches of the catchment and discharges directly to a tidal edge where flows are dissipated. There are no downstream properties within the tidal margin.
9. I also agree with Mr Senior that if upstream development stages are proposed first, conveyance to the tidal edge will need to be provided.
10. I agree with Mr Senior’s response, point 4.6 to Mr Westwood’s concern regarding the concerns about high groundwater levels and soakage capacity at Windsor Way. “The SMP does not require soakage as the sole method of disposal where soil conditions are unsuitable. Peat recharge is an industry accepted groundwater management method to

maintain the hydrological regime of the peat soils.” And that “The SMP provides flexibility but will also ensure that development does not proceed unless stormwater and groundwater impacts can be mitigated through engineering design.”

11. Geotechnical investigations will be undertaken at time of future Resource Consents in order to confirm this approach.
12. I agree with Mr Senior’s Response in point 4.7 to Mr Westwood’s concern “*deferring technical resolution to the consenting stage is inconsistent with the NPS-NH*”. Development areas identify where natural hazards are and the SMP provides a pathway to how the flood hazard is mitigated within the site.

NPS-NH

13. My assesment concluded that the risk of the PPC85 is moderate to minor in relation to NPS-NH flooding for the PPC85 site.
14. The assessment undertaken and the conclusions are consistent with those set out in the Supplementary Evidence of Mr Senior.

Conclusion

15. I conclude that the Stormwater Management Plan is appropriate and provides sufficient and appropriate detail to support the PC85 plan change and the future urban development of the land when that occurs.
16. Hazard risks are moderate to minor and can be managed through the design process at Resource Consent stage for future developments within PPC85.
17. I concur with Mr Senior’s statement that “Overall, in my opinion, there is no stormwater or flooding related reason to decline PPC85.”

Evan Alexander Peters

17 February 2026