

IN THE MATTER of the Resource Management Act 1991(RMA)

AND

**IN THE MATTER of Private Plan Change 100 - Riverhead to the
Auckland Unitary Plan**

JOINT WITNESS STATEMENT (JWS) IN RELATION TO:

Topic: WATER & WASTEWATER and PLANNING (2)

Date 21 July 2025

Expert Conferencing Held on: 21 July 2025

Venue: Auckland Council Offices (135 Albert Street, Auckland Central) and Online

Independent Facilitator: Marlene Oliver

Admin Support: Kasey Zhai

1 Attendance:

- 1.1 The list of participants is included in the schedule at the end of this Statement.
- 1.2 Declarations – the participants expertise and roles are set out in the schedule. This JWS should be read having regard to those relationships.

2 Basis of Attendance and Environment Court Practice Note 2023

2.1 All participants agree to the following:

- (a) The Environment Court Practice Note 2023 provides relevant guidance and protocols for the expert conferencing session;
- (b) They will comply with the relevant provisions of the Environment Court Practice Note 2023;
- (c) They will make themselves available to appear before the Panel;
- (d) This statement is to be filed with the Panel and posted on the Council's website.

3 Matters considered at Conferencing – Agenda and Outcomes

3.1 HP2 Are the Housing and Business Development Capacity Assessment (HBA) plan enabled numbers of 1,800 to 8,000 DUEs for all of Kumeū-Huapai-Riverhead area realistic, or are these numbers likely to be conservative for the reasonably expected to be realised development?

3.1.1 CH and CW clarified that the HBA Plan Enabled Capacity (PEC) of 1,800 DUEs is based on the AUP zones only and excludes PC78, and the PEC is intended to give a theoretical maximum. It is not a feasibility assessment taking into account other AUP overlays or Auckland-wide provisions and constraints, nor does it consider profit margins or development costs.

3.1.2 CH clarified that the HBA PEC of 8,000 DUEs is based on Auckland Council's HBA and an assumption that MDRS would be applied to the Kumeū-Huapai-Riverhead area.

3.1.3 CH and HS clarified that Watercare's evidence has relied on the HBA assessment prepared and published by Auckland Council in 2023.

3.1.4 CW and TH consider that the HBA PEC of 1,800 DUE is not realistic or accurate, and is optimistically high, because:

- a) The HBA numbers are from 2021 and are now out of date considering the continued development of the Kumeū, Huapai and Riverhead areas since the HBA assessment was undertaken;
- b) The HBA plan enabled numbers do not consider all relevant AUP provisions/limitations and therefore over-state plan enabled capacity; and
- c) The HBA plan enabled capacity numbers are entirely theoretical and will sit substantially above the reasonably expected to be realised development (RER) numbers.

3.1.5 CH noted that given the intended use of the HBA to identify the upper limit of development based on only the zoning, the likely development would be less than this upper limit.

3.2 HP3 Is it necessary to carry out a more detailed and accurate assessment of the reasonably expected to be realised capacity (RER). If not necessary, what are the RER numbers for the Kumeū-Huapai-Riverhead area?

3.2.1 CW, TH, KC, DW, and LA consider that for the purpose of evaluating PC100, it is necessary to carry out a more detailed and accurate assessment for the reasons given above in section 3.1.

3.2.2 CH, HS, and LA agree that a more accurate RER would be useful to assist the Hearing Panel, but note that it is not a commitment by Watercare to provide water supply and wastewater connections at the Plan Change stage.

3.3 HP4 If additional assessment work is required, what does this involve and how long would that take?

3.3.1 CW and TH consider that additional assessment work to establish the RER should involve:

- i. The assessment of PEC that addresses the issues raised in response to Question HP2, including all relevant AUP provisions.

- ii. The assessment of commercially feasible residential development capacity within the catchment, including the extent of feasibility at a 20% profit margin by typology. This includes sale prices, construction costs, earthworks, interest rates, levies, etc. This will provide a more accurate picture of commercially feasible capacity.
 - iii. The assessment of the RER given demand profiles, risk assessment for typologies and existing market conditions and metrics.
 - iv. This will provide a more accurate picture of what the market is likely to build over the next 30-years.
- 3.3.2 The applicant's experts are carrying out additional work to establish revised RERs and feasibility. The applicant's experts will pre-circulate their full methodology and assumptions for comment ahead of the outputs. The intent is that this work will be completed before the PC100 Water and Wastewater Expert Conference Session 1B/3 scheduled for 14 August 2025.
- 3.4 **HP5 If the mandatory Medium Density Residential Standards are removed, what impact will that have on the RER numbers?**
- 3.4.1 All experts agree that MDRS was never applied to the residential zones in the Kumeū-Huapai-Riverhead area under PC78, therefore the removal of the MDRS would have no impact on the RER numbers. However, refer to paragraph 3.1.2 which clarifies that the published HBA output did assume MDRS applied to the Kumeū-Huapai-Riverhead area for the PEC of 8,000 DUE.
- 3.4.2 DW notes demand for some infrastructure may be affected by any removal of PC78 within the main urban area beyond Kumeū-Huapai-Riverhead, e.g., Massey, Northwest, Red Hills. Where this infrastructure serves (or is intended to serve) both the main urban area and Riverhead then some allowance may have to be made for this.
- 3.5 **Additional relevant HP Questions**
 - HP6 What is the RER for Riverhead?**
 - HP7 What water/wastewater capacity needs to be left for the RER in Kumeū and Huapai?**
- 3.5.1 The experts note that HP6 and HP7 are relevant to this expert conference topic but cannot be addressed at this time. These questions will be addressed in future expert conferencing sessions.
- 4 PARTICIPANTS TO JOINT WITNESS STATEMENT**
- 4.1 **The participants to this Joint Witness Statement, as listed below, confirm that:**
 - (a) They agree that the basis of their participation and the outcome(s) of the expert conferencing are as recorded in this Joint Witness Statement; and
 - (b) They have read the Environment Court's Practice Note 2023 and agree to comply with it; and
 - (c) The matters addressed in this statement are within their area of expertise; and
 - (d) As this session was held both in-person and online, in the interests of efficiency, it was agreed that each expert would verbally confirm their position in relation to this para 4.1 to the Independent Facilitator and the other experts and this is recorded in the schedule below.

Confirmed: 19 June 2025

EXPERT'S NAME & EXPERTISE	PARTY / ROLE	EXPERT'S CONFIRMATION REFER PARA 4.1
Karl Cook (KC), Planning	RLG (Applicant) Consultant	Yes
Cam Wallace (CW), Planning	RLG (Applicant) Consultant	Yes
Tim Heath (TH), Economics	RLG (Applicant) Consultant	Yes
Kelsey Bergin (KB), Planning	Fletcher Residential Limited (with the applicant) Employee – Development Manager	Yes
David Wren (DW), Planning	Auckland Council (s42A team) Consultant	Online Yes
Louise Allwood (LA), Planning	Watercare Services Limited Consultant	Yes
Chad Hu (CH), Planning	Watercare Services Limited Employee – Strategic Planner	Yes
Helen Shaw (HS), Engineer – Water and Wastewater	Watercare Services Limited Employee – Head of Strategy and Consenting	Yes