

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

AND

**IN THE MATTER of Private Plan Change 109 – Whenuapai Green
to the Auckland Unitary Plan**

JOINT WITNESS STATEMENT (JWS) IN RELATION TO:

Topic: WATER & WASTEWATER (2)

Date 5 September 2025

Expert Conferencing Held on: 5 September 2025

Venue: Online

Independent Facilitator: Marlene Oliver

Admin Support: Isobel Lee

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.
- 1.3 Note from the facilitator -apologies:

Tim Heath (Economist for s42a team), Andrew Deutschle (Watercare) and Fraser Colegrave (Economist for the applicant) were not available to attend because of prior commitments.

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

Note: this expert conference continues on from the session held on Tuesday 2nd September 2025 and the Joint Witness Statements from these two sessions should be read together.

For clarification, the original list of questions relating to water included in JWS (1) have been altered during this expert conference.

WATER

3.1 Background and update

3.1.1 TS provided the following information with reference to three slides which are attached (Attachment A):

3.1.2 Slide 1

(TS) Water moving through the North Harbour 1 (NH1) supports a large area of Auckland, including all of the Hibiscus Coast / Whangaparaoa (until 2038 when the Orewa 3 will be built). This means that Watercare must not only consider growth in West Auckland but also Whangaparaoa when determining the remaining capacity and anticipated growth for the NH1.

3.1.3 Slide 2

(TS) Parts of West Auckland are supplied through the Waitakere 1 and 2. Capacity in these transmission lines is limited. Any shortfall is met by operating the Hobsonville Pump Station (PS) and the Pleasant Rd PS. If Hobsonville PS is operating, this puts further demand on the NH1. This means that growth beyond the capacity of the Waitakere 1 and 2 can be supplemented by the NH1 and needs to be considered as part of the bigger picture for water demand.

3.1.4 Slide 3

(TS) Peak demand has been translated to a population equivalent. The previous highest peak demand Watercare has observed was in 2020. Watercare is planning on the basis that a peaking factor similar to this is likely to be experienced in the next 10 years. Available capacity will be significantly increased once the NH2 is built and commissioned. If growth follows the AGS line, there is sufficient headroom for risk and allowance for uncertainty before the NH2 is built. Following a Statistics New Zealand high growth line shows remaining capacity would be eroded well before the anticipated completion of NH2. It may be possible to allow some growth above the AGS rate of growth line, however there are risks in doing this, not least the possibility of having to decline future connections (including for existing live zoned land).

3.1.5 CA notes that one of the risks that Watercare is trying to manage is the reputational risks of having to decline a connection application at whatever stage it might occur. The proposed Precinct provisions allow Watercare to decline to service at an earlier stage in the process, however it still requires Watercare to decline it. It also allows applicants to spend more money on applications before getting notice that their application will be declined. This causes reputational and financial pressure on Watercare to do what is necessary to solve the problem, at the expense of other priorities around the region, including but not limited to diverting resourcing and funding from other parts of Auckland signalled in our wider planning documents.

3.1.6 TS notes that the full NH2 pipeline is due for completion in 2034, however, given the project is at such an early phase, there is uncertainty in staging and opportunity for early benefit for growth. Where possible earlier built sections will be lived in. Depending on which sections are first there

may be additional capacity available before 2034. Staging may determine that capacity for growth is only available at the ultimate completion date. Additionally, the project timeline still carries some risk and uncertainty. Any delay to completion date would pose a significant risk in Watercare's ability to meet growth if out of sequence development is accepted.

- 3.1.7 TS notes that Watercare is relying on previously observed peak demand (2020). If a more severe peak demand period occurred before the NH2 is built, this would further constrain Watercare's ability to meet growth demands.
- 3.1.8 TS notes that the NH1 not only supports west Auckland but all of Whangaparaoa. If growth occurs faster than anticipated in these areas, the remaining capacity in the NH1 could be exceeded before the NH2 is constructed. This would ultimately force Watercare to decline requests for new connections, including those from land already live zoned.
- 3.1.9 PB notes that the proposed Precinct provisions provide a trigger that prevents service connections to water and wastewater infrastructure if there is insufficient capacity in those networks. PB considers that this mechanism sufficiently addresses the issues of timing, uncertainty and risk for Watercare, given that it provides a specific ability to manage timing of connections. This is a matter that will be addressed further in the planning expert conference.

3.2 **Question (a)**

Following conferencing on PC100, does Watercare maintain its opposition to PC109, or is there now sufficient headroom to accommodate the build out of PC109 beginning 2031? If Watercare accepts there is now sufficient headroom to accommodate PC109, then go to question P.

- 3.2.1 TS considers that there may be sufficient headroom to accommodate PC109, however, given the extended timeline and significant remaining uncertainty in project deliverables, and uncertainty with multiple other plan changes in flight, Watercare would be unable to commit at this time that there would remain sufficient headroom all the way until NH2 is built.

3.3 **Question (b)**

What is the water infrastructure capacity (DUEs) that is currently available within the NH1 catchment?

- 3.3.1 RW understands that the current Watercare projections show capacity will be available to service PC109 before NH2 is built, based on the current construction programme and conservative growth and demand assumptions.
- 3.3.2 RW and TS agree, based on Slide 3, that as of today and assuming a 2020 peak demand scenario, there is capacity for a further 30,000 PE (person equivalent) or 10,000 DUE.

3.4 **Question (c)**

Is the Auckland Council Growth Scenario 2023 version 1.1 for the NH1 catchment correct to date? If not, what is the difference between projected and actual growth?

- 3.4.1 In the JWS Water & Wastewater (1) (dated 2nd September 2025) it is recorded that "FC considers the AGS growth projections used for the area serviced by NH1, or at least the Redhills part, to be unrealistically high. Refer to FC's position statement (Attachment A, para 5-13). Refer to the

discussion in response to questions r and s.”

- 3.4.2 CA and PB agree that in relative terms the AGS is likely to be a more appropriate projection of growth for water supply (relative to the wastewater which is much more localised) because it is a much larger supply zone and the regional averages are more likely to apply.

- 3.4.3 TS notes that Watercare needs to allow headroom for fluctuations in true peak demand which can vary relative to observed population growth.

3.5 **Question (d)**

If the mandatory Medium Density Residential Standards (MDRS) are removed, what impact will that have on projected growth in the NH1 catchment (taking into account Council’s replacement plan change in anticipation of PC78 being withdrawn)?

- 3.5.1 All agree that this be included in the agenda for the planning expert conferencing session.

3.6 **Question (e)**

What is the projected demand as at 2031 for water network capacity in the NH1 catchment?

- 3.6.1 FC does not have the necessary information to calculate this demand. However, based on my response to question (e), it seems highly likely that actual water demand in 2031 will be far less than the AGS’ projections imply.

- 3.6.2 (TS) See above statements in relation to Slide 3.

3.7 **Question (f)**

Should water demand modelling be based on the 2020 peak day? What are the changes in projected demand in the NH1 catchment if the 2020 peak day is not used? What are the likely adverse effects from not using the 2020 peak day?

- 3.7.1 RW considers that adopting the February 2020 peak day as the base for the modelling, in conjunction with other conservative factors (i.e., per capita demand; population growth; and delays to the construction / commissioning of NH2) is overly conservative. It is understood that the February 2020 peak day demand was 7% higher than the February 2025 peak day demand.
- 3.7.2 TS considers that modelling based on the 2020 peak day remains a prudent approach as this is a likely demand to be experienced in the next decade. Planning based on a 2025 peak day may see available capacity over allocated creating a shortfall if a 2020 peak demand scenarios was observed.

3.8 **Question (g)**

What figure should be used for per person per day water demand?

- 3.8.1 RW considers the figures used by the Infrastructure Commission should be used for growth. Those figures identify an average of 146 L/person/day for metered residential connections in Auckland. Allowing 15% for Unaccounted for Water (UfW) equates to approximately 170 L/person/day. 220 L/p/day and three people per DUE, as used by Watercare, is conservative, including in conjunction of other conservative factors identified in my position statement. 220 kilolitres per DUE per annum also quoted by Watercare equates to 200.9 L/person/day based on 3 people per DUE.

- 3.8.2 CA considers that per person water demand is less important on the basis that the graphs provided by TS have converted capacity into a population figure which can then be compared directly with the AGS and/or Statistics New Zealand high growth projection line. Any variability in the peak factor or the average demand have been collated in the conversion to the population capacity.

3.9 **Question (h)**

What is the likelihood of there being capacity to service PC109 if NH2 is commissioned in a staged manner?

- 3.9.1 (TS) refer to the response under 3.2.1 above.

- 3.9.2 RW notes that whilst NH2 is identified as having a total length of 32 kms, it is the first half of the pipeline that would free up capacity for the Whenuapai FUAs. It makes logical sense that the first half of the pipeline would be constructed first, as this would be required to facilitate increased flows through the second half of the pipeline. I consider it likely that the first half of the pipeline would be completed and commissioned ahead of the complete pipe length. In terms of the timing of commissioning NH2 is 2034 based on the Gantt Chart provided by Watercare.

3.10 **Question (i)**

What bulk and local water infrastructure upgrades are required to service PC109 other than NH2 (if any)?

- 3.10.1 RW considers that two local network upgrades, as identified in my evidence, are required to service the plan change area: commissioning of the existing main in Fred Taylor Drive; and replacement / upgrading of a 150 AC pipe in Brigham Creek Road at the intersection with Hobsonville Road. Local network water mains will be required within the plan change area. The above works would be subject to Engineering Plan Approval and constructed by the developer and at its cost.
- 3.10.2 TS agrees that at least the above infrastructure is required, noting that focus has been on bulk infrastructure to date.
- 3.10.3 RW considers that no bulk water upgrades are required to service PC109 in the short term. NH2 is ultimately required to service future growth in the wider NH1 / NH2 supply area.
- 3.10.4 (TS) refer to the responses under 3.1 and 3.2.1 above.

3.11 **Question (j)**

What is required to get the required infrastructure built and in / on the ground?

- 3.11.1 RW considers all network upgrades would be subject to Engineering Plan Approval and constructed by the developer and at its cost. Offsite network upgrades / new water mains are within public roads minimising consenting risks.
- 3.11.2 TS agrees with respect to required local network upgrades. The position remains that NH2 is required which is a significant program of work and is still in the early phases of design.

3.12 **Question (k)**

By when do these upgrades need to occur in order for PC109 to begin build out?

3.12.1 RW notes that local network upgrades as detailed in response to question (i) are required ahead of servicing the plan change area.

3.12.2 TS agrees with respect to required local network upgrades. The position remains that NH2 is required which is a significant program of work and is still in the early phases of design.

3.13 **Question (l)**

What interim solutions are available and appropriate to service PC109?

3.13.1 RW considers that no interim solutions are considered to be required.

3.13.2 TS considers the only viable servicing option is the completion of NH2. There are no Watercare lead interim solutions available.

3.14 **Question (m)**

Can PC109 advance relying on the interim solutions or on a staged basis? If so, what would this involve?

3.14.1 RW considers that no interim solutions are considered to be required. RW considers that staged completion of the southern or first half of NH2 would provide ultimate capacity for the Whenuapai area and provide benefit to Watercare ahead of full completion of the pipe.

3.14.2 TS considers the only viable servicing option is the completion of NH2. There are no Watercare lead interim solutions available. See response under 3.6.1 above.

4 PARTICIPANTS TO JOINT WITNESS STATEMENT

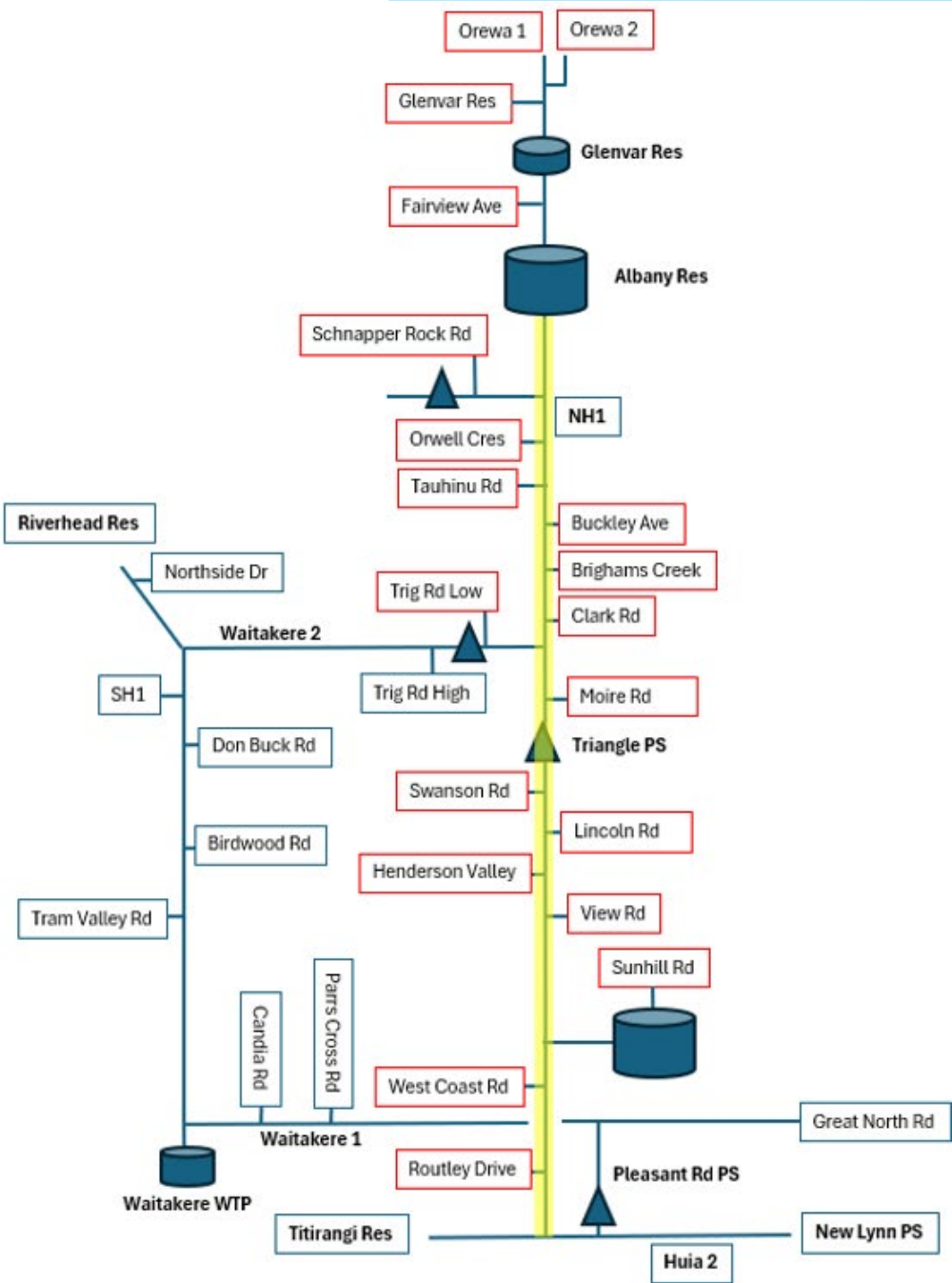
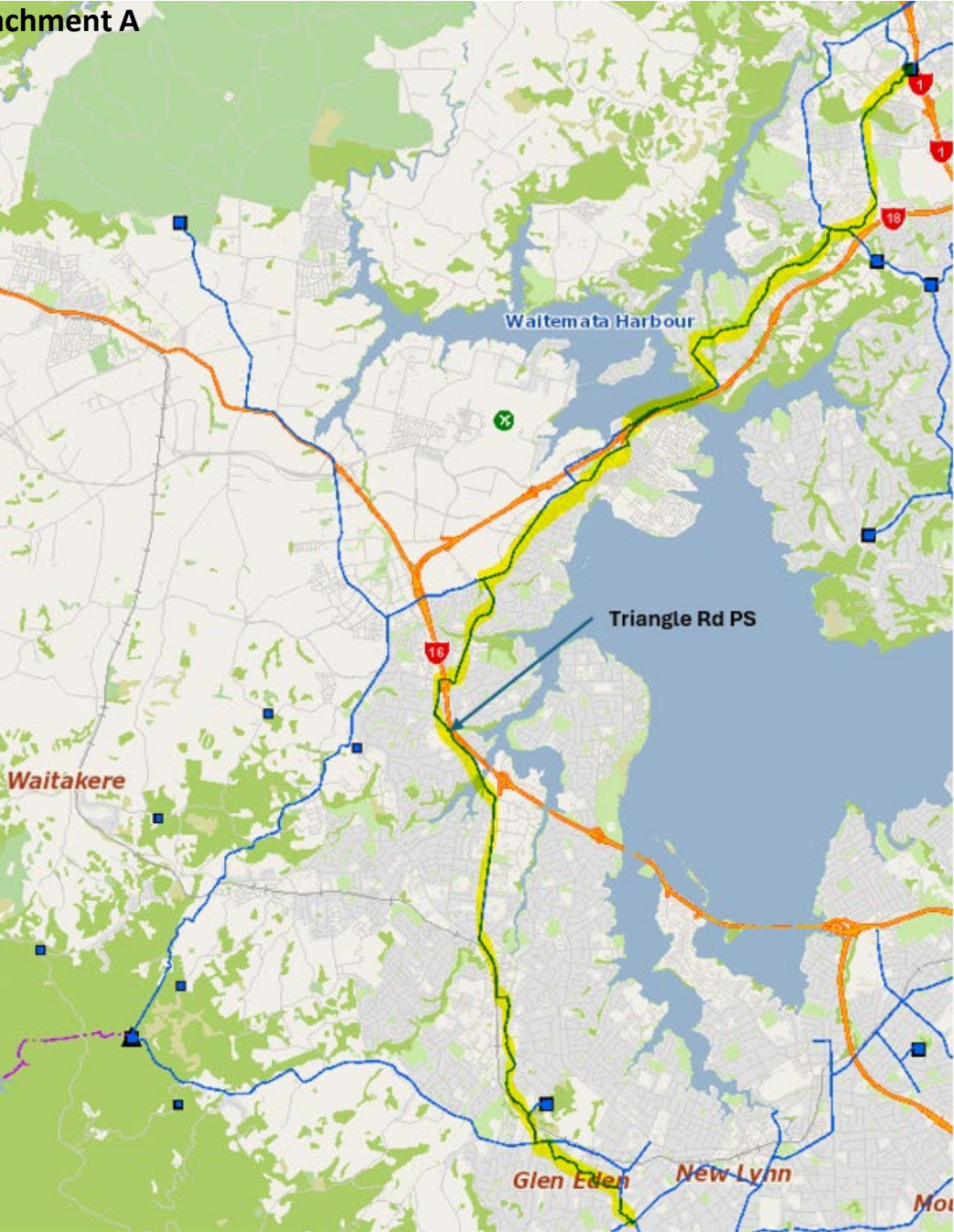
4.1 **The participants to this Joint Witness Statement, as listed below, confirm that:**

- (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 agree to the introduction of the attached information – Refer to para 3.1 above; and
- (c) They have read the Environment Court’s Practice Note 2023 and agree to comply with it; and
- (d) The matters addressed in this statement are within their area of expertise; and
- (e) As this session was held 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.

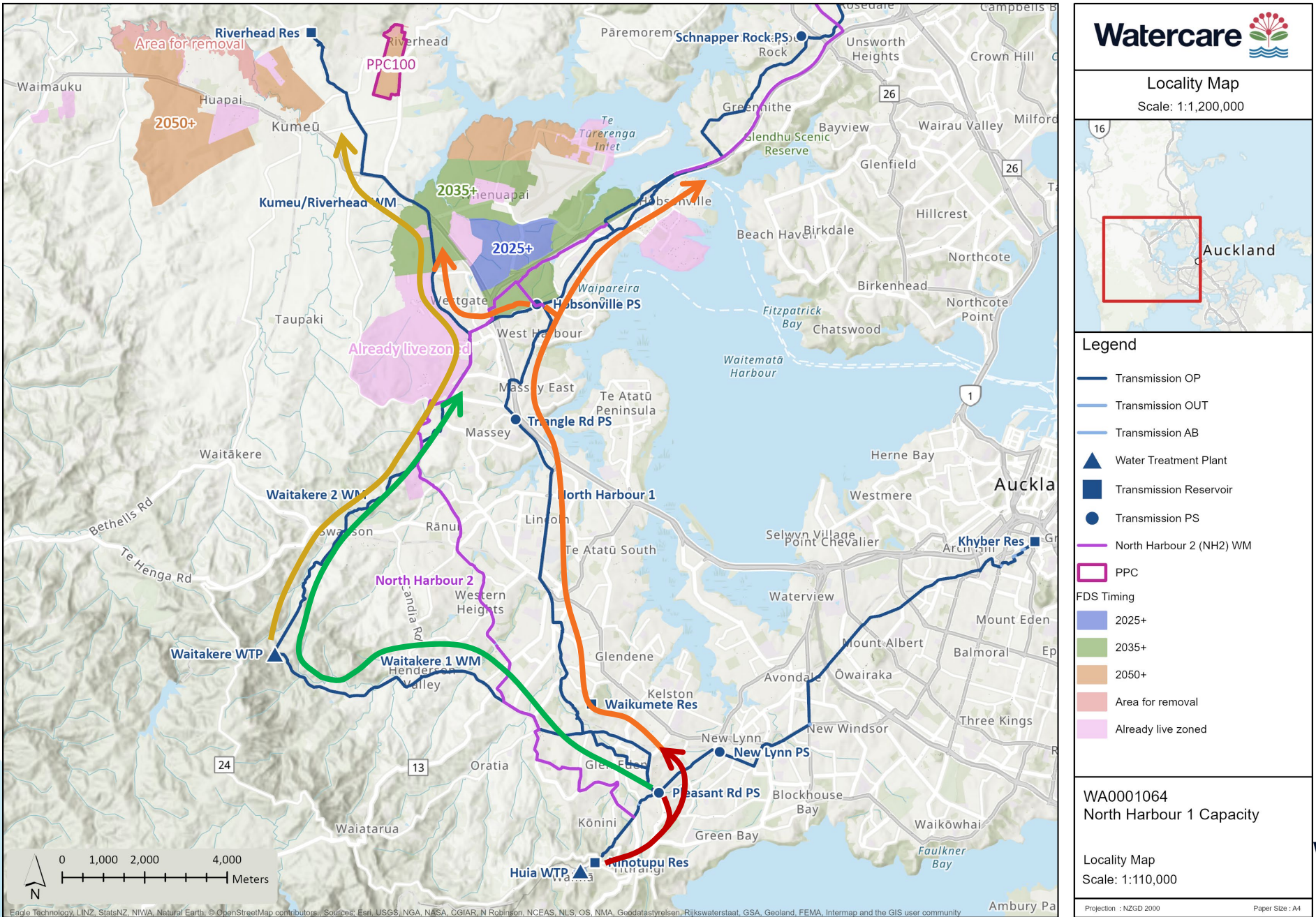
Confirmed Online on 5 September 2025

EXPERT'S NAME & EXPERTISE	PARTY	EXPERT'S CONFIRMATION REFER PARA 4.1
Vanessa Wilkinson (VW), Planning	Auckland Council (s42A team) Consultant	Yes
Michele Perwick (MP), Planning	Auckland Council (submitter) Employee – Senior Policy Planner	Yes
Chris Allen (CA), Engineer – Strategic Planning	Watercare Services Limited Employee – Strategic Planning Manager	Yes – attended from 9am- 12.30pm for sections 3.1-3.9
Robert White (RW), Engineer – Water and Wastewater	Neil Construction Limited (Applicant) Consultant	Yes
Philip Brown (PB), Planning	Neil Construction Limited (Applicant) Consultant	Yes
Jenny Vince (JV), Planning	Watercare Services Limited Consultant	Attended from 9-11am
Tim Scheirlinck (TS), Engineer	Watercare Services Limited Employee – Head of Water Planning	Yes

Attachment A



Supply Via Waitakere WTP & Pleasant Rd PS (Waitakere 1/2) & Hobsonville PS (NH1)



NH1 - Remaining Peak Capacity vs Growth Expectations

Future System Operation for Waitakere Support Via : Pleasant Rd PS (Waitakere 1) & Hobsonville PS (NH1)

