

27 June 2025

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By Email

WATERCARE SERVICES LIMITED – POSITION ON PRIVATE PLAN CHANGE 109

1. Watercare Services Limited ("**Watercare**") made a submission on proposed Private Plan Change 109: Whenuapai Green to the Auckland Unitary Plan (Operative in Part) ("**Plan Change 109**") on 21 February 2025.¹ As you know, Plan Change 109 seeks the rezoning of land within the Whenuapai North (Stage 1) Future Urban Area from Future Urban to Residential - Mixed Housing Urban ("**Plan Change Area**").
2. The notice of hearing for Plan Change 109 was received on 13 May 2025, which contained an evidence exchange timetable. The purpose of this letter is to update the Applicant and the Reporting Planner on Watercare's position on Plan Change 109, ahead of the Section 42A Report and Applicant evidence being drafted and filed.
3. Watercare's overall opposition to Plan Change 109 as set out in its submission has not changed, however, the technical details in relation to capacity of the bulk water supply network (and therefore Watercare's ability to service the Plan Change Area) has been updated since the submission. This letter also clarifies Watercare's position in relation to wastewater servicing.

Watercare's Submission

4. Watercare's position in its submission was that Plan Change 109 should be declined and, if it is approved despite Watercare's opposition, amendments should be made to the precinct provisions to ensure that subdivision and development is staged in a way that ensures it does not occur in advance of essential infrastructure upgrades.
5. Watercare's fundamental concern as set out in its submission is that Plan Change 109 is out of sequence with the timing provided in the Auckland Future Development Strategy ("**FDS**") that identifies the Whenuapai North (Stage 1) Future Urban Area, which contains the Plan Change Area, as not ready for development before 2035+. Given Watercare plans its bulk infrastructure development and funding to align with the timing provided in the FDS, out of sequence development (such as that proposed by Plan Change 109) cannot be supported.
6. The submission also detailed the following capacity constraints in the bulk wastewater and water supply networks for the Whenuapai North (Stage 1) Future Urban Area:
 - (a) In relation to the bulk wastewater network, the submission set out that there was no capacity in the existing network to enable development of the Plan Change

¹ Watercare also made a further submission on Plan Change 109 dated 28 March 2025.

Area ahead of the completion of the Whenuapai and Redhills Wastewater Scheme Packages 1 and 2.

- (b) In relation to the bulk water supply network, the submission set out that there was sufficient capacity for servicing of the Plan Change Area. The submission explained the full build out of the Whenuapai North (Stage 1) Future Urban Area would require the completion of the North Harbour 2 Watermain and Trig Road Reservoir to be completed.

Watercare's position on bulk water supply

7. Since Watercare's submission was lodged, and as a result of increasing network limitations across the broader network, Watercare has revised its position on its ability to service the Plan Change Area for water supply.
8. The Plan Change Area is within the area supplied with water by the North Harbour 1 Watermain. Premature use, and overallocation of, capacity in the North Harbour 1 Watermain will ultimately result in reduced levels of service to the wider western and north Auckland community, particularly at peak times. This includes the network being unable to meet levels of service in peak demand, provide sufficient pressure and volumes for firefighting water supply, and maintain network resilience during planned and unplanned events. While the Trig Road Water Reservoir, forecast to be delivered after 2034, will help balance peak demands, the North Harbour 2 Watermain is the primary infrastructure requirement to support growth.
9. Given the uncertain timing of delivery for the North Harbour 2 Watermain and the current live-zoned land which, when developed, will connect to the North Harbour 1 Watermain, at present, Watercare's position is that the Plan Change Area cannot be serviced by the bulk water supply network until the North Harbour 2 Watermain is completed and commissioned. This is currently forecast for completion in 2034, although it is noted that there are risks associated with its delivery timeline.
10. Being a responsible water services provider, Watercare is applying an appropriate level of planning to ensure staged development is implemented in such a way where we do not oversubscribe demand on our network. This will ensure a secure and resilient supply for West and North Auckland is maintained.
11. A technical memo is **attached** to this letter which provides further detail in relation to the water supply constraints detailed above.

Watercare's position on bulk wastewater

12. Since Watercare's submission was lodged, and due to faster-than-expected uptake of planned development in the catchment, Watercare seeks to clarify its position on wastewater servicing for the Plan Change Area.
13. As set out in Watercare's submission, prior to the Slaughterhouse Wastewater Pump Station reaching its design capacity, the Brigham Creek Wastewater Pump Station will be required to support further development in the Whenuapai and Redhills area. The Brigham Creek Wastewater Pump Station is the ultimate Wastewater Pump Station for servicing the Huapai-Kumeū, Riverhead, Redhills and Whenuapai areas that will complement the future Slaughterhouse Wastewater Pump Station in line with growth forecast by the FDS.

14. Where land is live-zoned earlier than expected, the faster-than-anticipated growth may cause the capacity of Watercare's infrastructure to be taken up faster than the programmed or future upgrades, such as the future Brigham Creek Wastewater Pump Station, can be delivered.
15. Recent levels of development planned in the catchment area which will rely on the Slaughterhouse Wastewater Pumpstation will result in the capacity in the Slaughterhouse Wastewater Pumpstation being taken up faster than anticipated. If further development is approved and progressed in advance of the timing provided in the FDS this would require the Brigham Creek Wastewater Pump Station to be constructed and commissioned earlier than planned. Given the Plan Change Area is identified as not ready for development before 2035+ in the FDS, the development of the Plan Change Area will prematurely take up capacity in the Slaughterhouse Wastewater Pumpstation.
16. It is therefore Watercare's position that the Plan Change Area cannot be serviced for wastewater until the construction and commissioning of the Brigham Creek Wastewater Pump Station and that therefore the Brigham Creek Wastewater Pump Station should be considered a pre-requisite for development of the Plan Change Area. The Brigham Creek Wastewater Pump Station is beyond the funding profile of the current Watercare Asset Management Plan FY25-34.

Conclusion and next steps

17. Watercare intends to file evidence ahead of the hearing on Plan Change 109 in relation to wastewater and water supply constraints in the area. This evidence will detail the existing constraints and required infrastructure upgrades for servicing, as set out in this letter.
18. Watercare is happy to meet with the reporting planner ahead of the hearing to discuss the content of this letter.

Nga mihi,

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Date: 27 June 2025
To: Vanessa Wilkinson
From: Tim Scheirlinck, Watercare Services Limited
Re: Private Plan Change 109, Water Supply Servicing

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Private Plan Change 109, Water Supply Servicing

1. Neil Construction Ltd is seeking a Private Plan Change for the rezoning of 16.36 ha of land at 98-100 and 102 Totara Road, from Future Urban to Residential – Mixed Housing Urban. The area subject to Plan Change 109 is within the Whenuapai North (Stage 1) Future Urban Area. The application documents as part of this Private Plan Change stated that this area is expected to yield approximately 430 dwellings. The area subject to Plan Change 109 has a legacy connection which Watercare has inherited, however this does not mean an increase in network capacity is available for the area.

North Harbour 1 Watermain

2. The area subject to Plan Change 109 is within the area supplied with water by the North Harbour 1 Watermain. The North Harbour 1 Watermain is currently Watercare's sole transmission watermain, conveying water from the west to the north across the Greenhithe Bridge.
3. Premature use, and overallocation of, capacity in the North Harbour 1 Watermain will ultimately result in reduced levels of service to the wider western and North Auckland community, particularly at peak times. This includes the network being unable to meet levels of service in peak demand, provide sufficient pressure and volumes for firefighting water supply, and maintain network resilience during planned and unplanned events.
4. The North Harbour 2 Watermain project is a proposed new watermain that will run for 33 kilometres between Huia Water Treatment Plant in Titirangi and the Albany Reservoirs. The construction and commissioning of the North Harbour 2 Watermain will support growth and resilience of supply in the North-West future urban areas (which include the future urban areas of Whenuapai, Red Hills, Kumeu-Huapai, Riverhead and the Hibiscus Coast and surrounding suburbs).
5. The North Harbour 2 Watermain is currently forecast for completion in 2034, although there are risks associated with its delivery timeline, and this could extend beyond 2035. The current Watercare Asset Management Plan Baseline FY25-FY34 includes funding for \$785 million (nominal \$) for the construction and commissioning of the North Harbour 2 Watermain.
6. Premature use and overallocation of the North Harbour 1 Watermain will introduce a capacity constraint. At present, Watercare cannot support connections to the public water supply network for future urban zoned land timed 2035+ from within the North Harbour 1 Watermain supply area prior to the completion of the North Harbour 2 Watermain. The construction and commissioning of the North Harbour 2 Watermain is therefore an infrastructure prerequisite for development of the area subject to Plan Change 109.