**BEFORE AN EXPERT CONSENTING PANEL**

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| **IN THE MATTER** | of the Fast-track Approvals Act 2024 (**FTAA**) |
| **AND** | |
| **IN THE MATTER** | of an application for approvals by Winton Land Limited to subdivide and develop 244.5 hectares at Old Wairoa Road, Cosgrave Road, and Airfield Road between Takanini and Papakura, Auckland into approximately 3,854 homes, consisting of individual homes and 3 retirement villages containing independent living units and associated features such as a 7.5 hectare town centre, a school, 4 local hubs, open spaces, green links, recreation parks and reserves and ecological areas (**Application**) |

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# ‘WILL SAY’ STATEMENT FOR EXPERT WITNESS CONFERENCING BY ANDREW DEUTSCHLE AND MARIA UTTING (WATERCARE SERVICES LIMITED)

**Wastewater Servicing / Low Pressure Systems**

**Dated: 7 November 2025**

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## 1. INTRODUCTION

1.1 This joint 'will say' statement is provided by Andrew Martin Deutschle and Maria Alice Utting on behalf of Watercare Services Limited (**WSL**) in relation to expert witness conferencing for the Sunfield Fast-track Application under the FTAA.

1.2 Andrew Deutschle and Maria Utting have not previously prepared a report in relation to the Application. Accordingly, this statement sets out their key opinions, in short form, on the issues that will be discussed at conferencing relating to wastewater servicing and low pressure systems. This statement is provided on the basis described in **Section 4**.

## 2. QUALIFICATIONS AND EXPERIENCE

### Andrew Deutschle

2.1 Andrew Deutschle is the Head of Wastewater Planning at WSL and a qualified engineer, with particular expertise in wastewater treatment facilities and wastewater networks. Andrew's qualifications and experience are detailed in **Attachment 1**.

### Maria Utting

2.2 Maria Utting holds the position of Team Leader – Wastewater Networks Planning at WSL and is a qualified chartered engineer with particular expertise in wastewater network level of service and providing for growth. Maria's qualifications and experience are also detailed in **Attachment 1**.

## 3. CODE OF CONDUCT

3.1 We confirm that we have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with the Code in the preparation of this statement. We agree to follow the Code of Conduct when participating in expert conferencing and any subsequent processes directed by the Expert Panel. We confirm that the opinions we express are within our areas of expertise and are our own, except where we state that we are relying on the work or evidence of others, which we have specified.

## 4. BASIS FOR STATEMENT

4.1 At paragraph 12 of the Panel's Minute 13 dated 5 November 2025, the Panel has indicated that it would be assisted by the experts addressing:

(a) Whether there is capacity in the bulk wastewater network to accept flows and loads generated by the Application; and

(b) Whether the proposed low-pressure system proposed is technically feasible notwithstanding WSL's *"policy of not accepting land serviced by more than 50 such connections"*. As a minor matter of detail, this aspect emerges from WSL's Code of Practice which should be referred to for the details.

4.2 In providing our expert opinions below, we record the Panel's express acknowledgement in Minute 13 that the following remain live issues, but are to be set to one side for the purposes of conferencing:

(a) WSL's position of not servicing rural-zoned land for water or wastewater; and

(b) The need, when undertaking capacity assessments for unanticipated and/or out of sequence developments, to consider the ability to supply future development of other land (e.g. existing live zoned land).

4.3 We have prepared this statement on the above basis.

## 5 WASTEWATER ISSUES

### Wastewater capacity and constraints

5.2 First, we address the Panel's question concerning whether there is capacity in the bulk wastewater network to accept flows and loads generated by the Application.

5.3 There are significant existing constraints in Southern Interceptor, as indicated by Watercare's modelled existing scenario, without the proposed loads and flows generated by the Application. Please refer to the snip of the current network below in **Figure 1**.

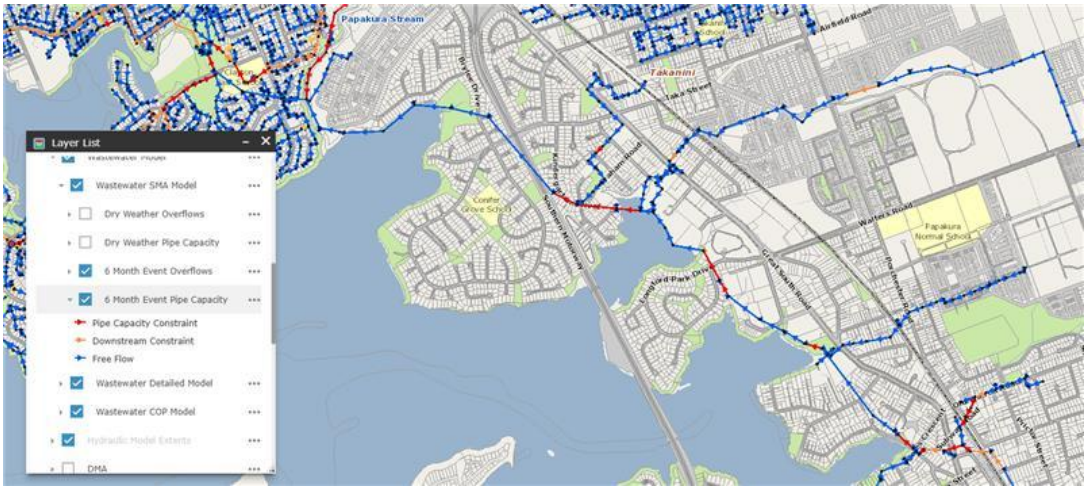


**Figure 1:** Existing Southern Interceptor Constraints (2024 System performance)

5.4 Due to this identified constraint, we confirm that there is not sufficient capacity currently available in the bulk wastewater network to accept flows and loads generated by the Application.

5.5 We note that this constraint should not be viewed in isolation as the bulk wastewater network is complex and interrelated.

5.6 We note that any decision on connections to the local wastewater network ultimately sits with Veolia for the Application site.

**Low Pressure Systems**

5.7 Next, we address whether the low-pressure system proposed by the Applicant is technically feasible and operationally acceptable.

5.8 While we acknowledge that the proposed low-pressure system may be technically feasible, it is however, at the scale proposed, operationally unacceptable as outlined by Watercare's Code of Practice.

5.9 A low-pressure system as proposed by the Applicant may only be considered where it has been demonstrated that a gravity system is not feasible, noting that determining that a gravity system cannot be achieved does not mean that a low-pressure system would be accepted. We note that no evidence, beyond high level statements, has been provided by the Applicant regarding the feasibility of a gravity network for this site.

5.10 A summary of why we consider the proposed low-pressure system to be operationally unacceptable was provided to the Applicant and is contained

within the Watercare and Winton – Sunfield Modelling Workshop Meeting Minutes dated 15/10/2025 and the Applicant's Response to Watercare Comments – Sunfield Fast-track Application dated 16th October 2025.

5.11 We note that any decision on the acceptability of the design of the local network to be vested as a public asset, including approval of connections to the local wastewater network, ultimately sits with Veolia for the Application site.

**DATED** the 7th day of November 2025

**Andrew Deutschle**

Head of Wastewater Planning, WSL

**Maria Utting**

Team Leader – Wastewater Networks Planning, WSL

**ATTACHMENT 1**

**Qualifications and Experience of WSL Experts**

**Andrew Deutschle**

1. I am the Head of Wastewater Planning at WSL.
2. I hold the qualification of a Bachelor of Engineering (Hons) from the University of Auckland. I have been employed by WSL for 16 years.
3. In my current role I am responsible for the planning of WSL's wastewater treatment facilities and wastewater networks. Specifically, I oversee and assist with the development of Facility and Network Servicing Plans which are prepared to inform the need for and timing of future wastewater projects across Auckland.
4. I also oversee and assist with the preparation of feasibility studies and concept designs for Watercare-delivered infrastructure. I am involved with considering and supporting developer-delivered infrastructure in situations where there is limited available capacity in the relevant network and / or treatment plant to support a proposed development.

**Maria Utting**

1. I hold the position of Team Leader – Wastewater Networks Planning at WSL.
2. I have the qualification of Bachelor of Engineering – Environmental from the University of Auckland.
3. I have been employed by Watercare for over 7 years. In my current role I am responsible for identification and prioritisation of projects required to maintain the wastewater network level of service and provide for growth. These projects form the Watercare Asset Management Plan. I am responsible for providing technical input to these projects during development to ensure that the solution delivers the identified business need.
4. Prior to joining WSL I had 10 years of experience as a consulting engineer largely focussing on hydraulic modelling of wastewater and stormwater networks, and civil design of wastewater and stormwater infrastructure.