

Ref: 215010

To: Simon Ash, Chief Operating Officer – Winton

From: Will Moore, Director – Maven Associates

Date: 15 July 2025

Subject: Response to Watercare – FTAA-2503-1039 Sunfield Proposal (BUN60447430)

Purpose of this Memorandum in Relation to Section 67 of the Fast-track Approvals Act 2024

This memorandum has been prepared by Maven Associates to provide support of the Sunfield FTAA by addressing the concerns raised by Watercare, as detailed in the Section 67 submission received from Council.

Watercare's Concern's Raised In the s67 Memorandum

Watercare's position, as outlined in the Section 67 submission received from Council, is that it is unable to provide water supply and wastewater services to the Sunfield FTAA development unless specific infrastructure upgrades are undertaken. These upgrades are not currently included in Watercare's 10-year business plan and would need to be funded by the Applicant.

Regarding water supply, while there is theoretical capacity available, it is contingent upon the completion of the Waikato-2 Watermain, which is not expected to be operational until the late 2030s. As for wastewater servicing, Watercare has indicated that the existing infrastructure, including the Takanini Branch Sewer and Southwestern Interceptor, lacks sufficient capacity to accommodate the development. Upgrades to these systems would also need to be financed by the Applicant.

Watercare has further expressed concerns regarding the Applicant's proposal to implement a low-pressure sewer system, as this does not align with Watercare's Code of Practice. Additionally, Watercare has stated that such a system is unlikely to adequately reduce wastewater flow, which would still necessitate significant upgrades to existing infrastructure.

In light of these points, Watercare maintains that the Applicant must demonstrate the provision of permanent private water supply and wastewater servicing solutions for the development.

Discussion

Future Urban Development Strategy

The proposed Sunfield development site spans approximately 57 hectares zoned as Future Urban Zone (FUZ) and 187 hectares zoned as Mixed Rural Zone (MRZ), as designated under the Auckland Unitary Plan (Operative in Part) (AUP(OP)).

The Future Development Strategy (FDS) has been addressed in detail within section 9.2 of the submitted Planning Report (pages 237 to 246), which addresses the key identified infrastructure pre-requisites within the FDS. It is noted that wastewater capacity and water supply are not identified infrastructure matters within the FDS in relation to the Takanini (Cosgrave Road), which is the 57 hectares of FUZ land.

In the original Future Urban Land Supply Strategy 2017 (FULSS), the FUZ portion of the subject site was scheduled to transition from its current zoning to urban development between 2023 and 2027. However, the revised FDS adopted in November 2023 has postponed the transition of the FUZ zone to 2050 or beyond. It is understood that this delay is primarily due to the Auckland Council's limitations in securing sufficient funding for next stages of the Takanini Conveyance Channel/Awakeri Wetlands, which services the stormwater and flood management for the FUZ land.

Prior to pursuing a formal request for a Fast-Track Development Application (FTAA), the applicant submitted a plan change application for the FUZ portion of the site in 2021.

The applicant proposes to fund and construct the next stages of the Awakeri Wetlands as part of the Sunfield development. This proactive investment in infrastructure should enable the transition of the FUZ zone to occur earlier than the 2050 timeline, aligning more closely with the original intended schedule.

Therefore, the deferral of this area being considered acceptable for growth under the FDS is largely a financially driven decision, not a planning one. Given it is anticipated that the infrastructure funding can largely be resolved, subject to more detailed discussions, Sunfield should return to a more logical and earlier planning development timeline.

Wastewater

As part of the plan change application, the capacity of existing wastewater and water supply infrastructure to support the proposed development of the FUZ was investigated with Watercare through consultation with their agent Veolia.

Veolia, on behalf of Watercare, formally confirmed (refer to attached email correspondence) that the existing Watercare transmission network has sufficient capacity to accommodate the anticipated wastewater discharge from the Peak Wet Weather Flow (PWWF) of 64.91 L/s generated by the full development of the FUZ zoned land, based on 1,550 residential units as outlined in the Awakeri Stage 3 Framework Plan. The Awakeri Stage 3 Framework Plan was created to guide the final development phase of the Awakeri Wetlands project in Takanini, with the primary purpose of enabling safe urban growth while delivering environmental, cultural, and community benefits.

This Veolia confirmation provides a critical foundation for the proposed wastewater servicing strategy for the proposed Sunfield development, which has been carefully designed to remain within this established discharge threshold.

The Applicant proposes the implementation of a Low Pressure Sewer (LPS) system, a proven and Watercare-accepted solution particularly well-suited to the Site's flat topography, high water table, and low-strength peat soils. By eliminating inflow and infiltration, which are common issues in gravity systems under similar ground conditions, the LPS network reduces actual discharge flows across the Sunfield site to a calculated 57.63 L/s—significantly below the 64.91 L/s capacity limit confirmed by the advice from Veolia.

This not only ensures compliance with the existing infrastructure constraints but also provides added resilience against peak flow events and long-term operational risks. Furthermore, based on the Veolia confirmation that the transmission network can service 64.91 L/s, it is assumed that the downstream wastewater treatment plant has been designed with adequate capacity to receive and treat the corresponding wastewater.

The proposed solution aligns with Watercare's engineering standards and also aligns with nearby developments such as Kuaka Drive and Mill Road, reinforcing the system's viability and reliability in comparable conditions.

As downstream upgrades are not required to service the wastewater discharge from development, it is assumed that any Watercare funding constraints for the development of Sunfield can be disregarded.

Water Supply

A preliminary assessment undertaken by Watercare indicates that there is sufficient capacity within the bulk water supply network to support the development of the 57 hectares of Future Urban Zone (FUZ) land, without compromising the development potential of other live-zoned areas. This initial confirmation establishes that both potable water and firefighting servicing capacity are currently available.

This confirmed capacity also supports staged extension into the 187ha of MRZ land, allowing any portion of the site to proceed, subject to normal infrastructure planning.



However, it is essential that a detailed assessment be undertaken to confirm the actual available capacity within the existing Bulk Supply Points (BSPs) and to determine whether these BSPs can be upgraded to accommodate additional flows or whether a new BSP is feasible on the 450mm diameter transmission main in Airfield Road.

This step is critical to ensure that existing infrastructure is fully utilised before consideration is given to Developer-funded interim BSPs or alternative connections. The Applicant requests that Watercare either undertake that assessment or provide the necessary data to enable an assessment to be undertaken.

The Applicant acknowledges that access limitations exist at existing BSPs and that access restrictions on Waikato-1 Watermain shutdowns currently prevent conventional connection methods for the new BSP. Nevertheless, these are not considered supply limitations and do not constrain the ability to develop the site. Rather, they are standard infrastructure coordination issues that are commonly managed in growth areas. Staged development supported by proven and funded engineering solutions remains entirely feasible and readily achievable.

In particular, access constraints are readily resolved through:

- Staged development aligned with BSP capacities;
- Developer-funded interim BSPs or live-tap connections that do not require watermain shutdowns;
- On-site water storage, including firefighting tanks, to meet pressure and volume requirements.

These are standard, accepted solutions, not theoretical options. Their feasibility is well-established and already implemented elsewhere in Auckland.

Developer funding will support all required infrastructure upgrades, ensuring that delivery is cost-neutral to Watercare and ratepayers, and that all risks are appropriately managed. Delaying development would result in avoidable economic, social, and housing-related costs.

Accordingly, there is no technical, planning, or policy-based justification for deferring development of any part of the site, including the Mixed Rural Zone (MRZ), provided appropriate servicing staging is implemented as proposed.

Conclusion

In summary, Watercare's confirmation of available water supply and wastewater capacity provides an undisputed, sufficient basis to support development of the Sunfield FTAA site now. Access constraints do not constitute a barrier to development when industry-standard staging solutions are available and fully implementable. We therefore request Watercare's commitment to enable connection planning and staged infrastructure delivery without delay, in accordance with its statutory responsibilities and Auckland's growth priorities.

Kind Regards

Will Moore
DIRECTOR
MAVEN ASSOCIATES LIMITED

ANNEX 1 EMAIL CONFIRMATION FROM VEOLIA

FW: 55 Cosgrave Road and 508 Old Wairoa Road - Water Supply and Wastewater Infrastructure

From Will Moore <

Date Mon 30/06/2

To Jignesh Patel

Cc Simon Ash <

For our records.

Will Moore
DIRECTOR

BE (Civil), MIPENZ, CPEng, IntPE(NZ)



MAVEN ASSOCIATES LIMITED

Level 1, 5 Owens Road, Epsom

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From: Morar, Sanjeev [REDACTED]
Sent: Friday, 12 April 2024 6:56 pm
To: Will Moore [REDACTED]
Cc: Khan, Hama [REDACTED]
Subject: Re: 55 Cosgrave Road and 508 Old Wairoa Road - Water Supply and Wastewater Infrastructure

Hi Will,

Watercare has advised there is capacity for the proposed 1550 DUE. I do note however, the Vector assessment was for 1700. Watercare have advised if this is the case, they will need to reassess capacity.

Regards,

Sanjeev Morar
Developments Manager
Veolia Australia and New Zealand

[REDACTED]
Address PO Box 72243, Papakura, Auckland, New Zealand

www.veolia.com/anz

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On Tue, 9 Apr 2024 at 09:40, Will Moore <[REDACTED]>

Hi team,

Just following up on this one, di we hear anything back form Watercare?

Will

Will Moore
DIRECTOR

BE (Civil), MIPENZ, CPEng, IntPE(NZ)



MAVEN ASSOCIATES LIMITED

[REDACTED]
Level 1, 5 Owens Road, Epsom

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From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]

Subject: Re: 55 Cosgrave Road and 508 Old Wairoa Road - Water Supply and Wastewater Infrastructure

Thanks Jignesh,

As discussed, we didn't receive an official response from Watercare.
I will check with Sanjeev the contact details if it was verbally or in writing and get back to you ASAP.

Regards.

On Tue, 20 Feb 2024 at 10:05, Jignesh Patel <[REDACTED]>

Hi Hamayoon,

As discussed, if you could check with Sanjeev and confirm that liaison with Watercare was undertaken as part confirming the capacity.

We look forward to your response.

Regards,

Jignesh Patel

PRINCIPAL

BE(Hons), CMEngNZ, CPEn



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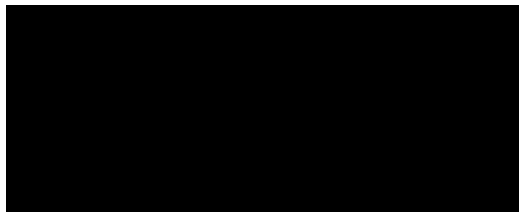
Can we get an update on the below please?

Will

Will Moore

DIRECTOR

BE (Civil), MIPENZ, CPEng, IntPE(NZ)



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From: Jignesh Patel
Sent: Friday, December 1, 2017
To: Khan, Hamayoon
Cc: Will Moore
Subject: RE: 55 Cosgrave Road and 508 Old Wairoa Road - Water Supply and Wastewater Infrastructure

Hi Hamayoon,

Hope you have been well!

Just following up to get an update on this one.

Regards,

Jignesh Patel
PRINCIPAL

BE(Hons), CMEngNZ, CPEng



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From: Will Moore <[REDACTED]>
Sent: Tuesday, November 28, 2017
To: Khan, Hamayoon
Cc: Jignesh Patel <[REDACTED]>
Subject: RE: 55 Cosgrave Road and 508 Old Wairoa Road - Water Supply and Wastewater Infrastructure

Hi Hamyoon,

Hope you are well.

I note below you state the capacity of the Takanini Branch will be checked with Watercare for acceptance.

I recall you were liaising with Watercare at the time of the email.

Can you please confirm this has now been done and capacity confirmed?

Thanks

Will

Will Moore
DIRECTOR

BE (Civil), MIPENZ, CPEng, IntPE(NZ)



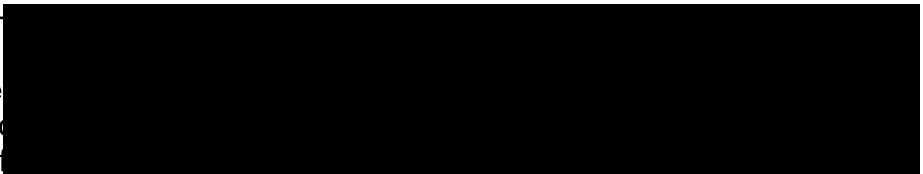
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From: Khan, Hamyoon
Sent: Wednesday, 14 November 2018
To: Will Moore
Subject: 55 Cosgrave Road, Papakura
Wastewater Infrastructure



Hi Will,

I have reviewed the application material received for the proposed development at 55 Cosgrave Road, Papakura and provide comments in matters pertaining to water and wastewater servicing below:

Currently, there is no existing water or wastewater infrastructure to allow for the servicing of the property 55 Cosgrave Road, Papakura. However, the

subject property forms part of Area 2A. The Developer will provide the 'trunk' connecting water supply and wastewater infrastructure for the Area 2A (including wastewater pumping station) necessary to enable development of property 55 Cosgrave Road, Papakura. Therefore, based on the information currently available to Veolia, water and wastewater servicing of the proposed development appears possible.

Wastewater

- The capacity of the existing Transmission infrastructure [Takanini branch] will be checked with Watercare for acceptance. The retail wastewater network [wastewater pumping station / low pressure system] and associated 'trunk' connecting infrastructure are to be constructed by the Developer at the Developer cost.

Water

- In regards to the retail water network and associated 'trunk' connecting infrastructure are to be constructed by the Developer at the Developer cost. Also please note that the Network analysis (water modelling) coupled with water supply capacity measurements will need to be undertaken as a part of a detailed engineering design to demonstrate appropriate servicing of the development is achievable.

General comments:

- Construction of any water or wastewater infrastructure shall not commence until such time as a Construction / Connection of New Works Agreement has been issued by Veolia and accepted by the applicant (including construction requirements and charges payable) which the applicant must comply with before Veolia either physically permit the connection if the future water / wastewater infrastructure to the existing water supply / wastewater system or provide water / wastewater services.


Please let me know if you want to discuss this further.

Regards

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**Hamayoon Khan | Projects Engineer | PTAG-Projects Technical Assets Group |
Veolia Australia and New Zealand**

201 Opaheke Road, Drury 2113

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**Hamayoon Khan | Projects Engineer | PTAG-Projects Technical Assets Group |
Veolia Australia and New Zealand**

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