

28 May 2026

Warwick Pascoe
Principal Project Lead
Auckland Council

Dear Warwick,

North-West Rapid Transit Fast-Track Substantive Application

Introduction and Summary

1. The New Zealand Transport Agency (NZTA or the Applicant) has lodged a substantive application under the Fast-Track Approvals Act 2024 (Act) for the Te Ara Hauāuru, the Northwest Rapid Transit Project (the Project). The Project involves the construction, operation and maintenance of new bus rapid transit (BRT) facilities alongside State Highway 16 (SH16) from the Brigham Creek Road/SH16 intersection through to Ian McKinnon Drive in the Auckland City Centre. This includes seven rapid transit stations and one Park and Ride facility at Brigham Creek Rarawaru. The approvals being sought by the Applicant under the Act comprise twelve Notices of Requirement (NoR) to designate the land for the proposed works and a number of regional resource consent applications (together, the Project).
2. Watercare welcomes the opportunity to provide comments on the application. As is common in large infrastructure projects, there are a range of overlapping infrastructure interests (including interests held by Watercare) in the proposed Project area. Watercare's interest in the Project is centred around ensuring that essential water and wastewater services are protected, access is maintained, and delivery of upgrades and new infrastructure is both enabled and able to be coordinated in the future.
3. Watercare wishes to acknowledge that the Applicant has engaged with Watercare early in relation to this Project, to inform identification of potential interface points with existing and future Watercare assets within the proposed Project Area. The Applicant has stated in their Application that they will continue to engage with Watercare as detailed design for the Project progresses, to make arrangements in relation to Project works. As acknowledged in the application, where Project works intersect with land subject to Watercare's designations already contained in the Auckland Unitary Plan (Operative in Part), the Applicant will be required to seek written approval from Watercare in accordance with sections 176/177 of the Resource Management Act 1991 (RMA) prior to works commencing. Watercare has been grateful for the early and constructive discussions with the Applicant and looks forward to those continuing.
4. In relation to the Project, Watercare seeks some targeted amendments to the proposed designation conditions which it considers will enable the Project to proceed as proposed, while safeguarding Watercare's existing assets and authorised future works. The amendments Watercare seek will also provide an opportunity for the parties to coordinate the design and delivery of infrastructure works in the future.

Watercare's purpose and role

5. Watercare is New Zealand's largest provider of water and wastewater services, operating as a substantive council-controlled organisation owned by Auckland Council with its purpose embodied in the Māori whakatauki "Ki te ora te wai, ka ora te whenua, ka ora te tangata" (When the water is healthy, the land and the people are healthy), reflecting the connection between its services and the wellbeing of the community and local environment. As Auckland's water and wastewater services provider, Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our mission is to provide reliable, safe, and efficient water and wastewater services to Auckland communities.

Watercare's interests within the proposed project corridor

6. Watercare's interests within the proposed project corridor can be separated into three categories:
 - a. Existing assets, which are constructed and lawfully established.
 - b. Planned works, which are authorised by way of existing approvals obtained under the RMA, for example a designation or resource consent.
 - c. Future planned works, which do not yet have RMA statutory approvals, but which Watercare plans to deliver in the future to service expected growth and needs of Aucklanders.
7. Watercare appreciates that the Applicant does not need to be concerned with Watercare's potential future works, where those are not authorised by an existing designation, for the purpose of this application. However, it wishes to note this category for completeness as it considers there may be opportunities in the future for the parties to work together to coordinate and deliver works within the Project corridor.

A - Existing assets within the Project corridor that are constructed and lawfully established

8. Watercare's most immediate interest is in maintaining the integrity, operability, and safe access to existing water and wastewater assets throughout the proposed Project corridor. These include transmission pipelines, pump stations, manholes, and associated facilities that currently serve Auckland communities. Watercare requires continuous, 24/7 operational access for maintenance, renewals, and emergency response, including heavy-vehicle access where needed, and expects that construction staging, temporary works, and permanent structures associated with the Project do not compromise asset integrity, service continuity, or safe access.
9. The key existing assets in the Project corridor are as follows (note, there are some additional interfaces than those included in the Application):
 - Newton 2 Watermain (Newton Road)
 - Northshore 1 Watermain (Newton Road)
 - Waitakere 2 Watermain (Fred Taylor Drive)
 - North Harbour 1 Watermain (Royal Road)
 - Western Springs Watermain (Arch Hill Station)
 - Arch Hill 1 Watermain (Niger Street)
 - Massey North Branch (Brigham Creek Road / Westgate)
 - Northern Interceptor (Moire Road) (D9377)
 - Swanson Branch (Lincoln Station)

- Pump Station 44 (Henderson Creek)
- Western Interceptor (Henderson Creek and Te Atatū / Lincoln Road)
- Te Atatū Branch (Te Atatū Station and Te Atatū Road)
- Ōrākei Main Sewer (Point Chevalier)
- Central Interceptor (Western Springs) (D9466)
- Branch 7 Arch Hill (Western Springs)

10. Watercare also notes there are a number of local water supply and wastewater assets that are not listed here.
11. Several of these existing bulk/transmission and local assets will likely require relocation or additional protection to accommodate the Project. Where this is required, those works must be planned and sequenced in collaboration and consultation with Watercare to avoid unplanned outages and environmental risk, with clear responsibilities, outage windows, and commissioning plans agreed well in advance. Where Watercare holds a designation authorising existing assets, these designations will have primacy over the Applicant's proposed designations, and the Applicant will be required to obtain a s176/177 approval from Watercare.

B - Planned works authorised by Watercare's existing designations

12. Watercare's second key interest is in planned work programmes which are already authorised by existing Watercare designations. These existing designations protect defined corridors and sites and ensure that third-party works do not prevent or hinder Watercare's designated public works.
13. For any Project works within existing Watercare designations, the Applicant will be required to obtain section 176/177 approvals from Watercare at a point where sufficient design detail exists.

The existing Watercare designations within the Project corridor include:

- **D9377** – Northern Interceptor Shared Corridor. This enables the North Harbour 2 Watermain (Gunton Drive & Widmore Drive), anticipated to begin construction in 2028
- **D9466** – Central Interceptor Main Works (under construction)
- **D9328** – Wastewater Pump Station (Te Atatū – constructed)

14. Watercare seeks and encourages ongoing engagement in relation to the coordination and alignment of the proposed works by the Applicant, which have the potential to interface with Watercare's planned and authorised works. Watercare considers there will be opportunities for the parties to align their respective work programmes through detailed design and staging. During both construction and operation, Watercare requires that operational access and emergency response capabilities for designated assets are preserved.
15. While it is not entirely certain at this stage of the Project design which of the entire list of Watercare's assets may conflict with the Project works, Watercare is already concerned with the coordination of the Project with the designated North Harbour 2 Watermain works (NH2) where the alignment conflicts with the proposed Northwest Rapid Transit busway underpass in the vicinity of Waiarohia Station. As the NH2 project is already authorised by a designation, Watercare's infrastructure has primacy in this location. However, the current North-West Rapid Transit Project proposal would result in a physical conflict with the NH2. NZTA and Watercare are working together on options to resolve this conflict, however, this work is currently not complete and still subject to change. Watercare strongly requests that NZTA continues to engage with Watercare,

including in relation to ensuring any conflicts are resolved early and that NZTA's outcome of detailed design does not impact planned works. An impact to planned works could require significant further expense or programme delay to Watercare (for example if ultimately relocation and realignment of NH2 is the only way to resolve a conflict with the works proposed for this Project).

C - Future works not yet authorised by existing RMA approvals

16. Watercare also has an interest in future works that are being developed to meet growth, resilience, and environmental objectives, but which are not yet authorised by existing designations or consents. Watercare acknowledges that these future projects are not a determinative consideration for the Panel's assessment of the Application. Nonetheless, Watercare considers this Project provides an opportunity for the parties to identify practical interfaces and considers joint planning / delivery can only benefit the Auckland community and the interests of each party. Such coordination has the potential to reduce community disruption, avoid re-work, and enable efficient, coordinated delivery where practicable.

Key comments on the application

17. Watercare acknowledges that overlapping designations and relocation / co-location of different infrastructure assets are common in large infrastructure projects. It considers it has a constructive working relationship with NZTA in relation to these matters.
18. Watercare appreciates NZTA's position that interfaces between the Project and utilities are governed by legislation and other regulatory frameworks which sit outside of the consenting / designation process. Watercare agrees that there are powers and protections available to utility owners outside the RMA which seek to address these interfaces - for example, Watercare's "works over" approval process set out in the Water Supply and Wastewater Bylaw 2015 provides a process whereby approval is required when undertaking building or excavation near or over public water or wastewater assets. However, Watercare considers the proposed conditions of designation should also provide a mechanism for the parties to work together to resolve infrastructure interface issues (particularly when there are as many as this Project has), to ensure the best outcome is reached for Aucklanders. The conditions Watercare seeks are intentionally targeted and intended to complement, rather than duplicate, other statutory mechanisms outside the RMA.
19. In order to navigate the challenges of overlapping interests and co-location of infrastructure, Watercare seeks an outcome based designation condition, which requires a jointly prepared Water and Wastewater Management Plan that (at a minimum):
 - a. Identifies existing and lawfully authorised critical water and wastewater assets within the Project corridor.
 - b. Provides a process whereby the parties can identify and resolve any clashes between existing or authorised Watercare assets which are lawfully authorised.
 - c. Includes a process for Watercare review of, and input into, detailed design by the Requiring Authority where those detailed designs involve modifications to, or relocation of, Watercare's existing bulk/transmission water and wastewater assets.
 - d. Details the operational access requirements and arrangements.
 - e. Sets out agreed protection or relocation methodologies, and programme outage and commissioning windows so that environmental and customer service risks are managed.

- f. Specifies programme-level coordination, including indicative long-lead notice and staging arrangements for works that may require outages or complex interfaces, with a mechanism for the Requiring Authority and Watercare to agree refinements based on risk and detailed design.
- g. Identifies opportunities for coordination of the delivery of planned infrastructure works.

Condition requested

- 20. As noted above Watercare seeks the following condition be included in each designation requiring a Water and Wastewater Management Plan to ensure the Project is coordinated efficiently and effectively with existing and planned Watercare assets and works. We are currently in discussions with NZTA on this condition and what the most appropriate method is to manage our ongoing engagement in relation to this Project.
- 21. It is noted this would also require an amendment to proposed condition 3(b), which sets out what management plans must be included in the Outline Plan.

Water and Wastewater Management Plan (WWMP)

- (a) *The WWMP shall be prepared by the Requiring Authority prior to commencing preliminary design for the first and each subsequent stage. The objective of the WWMP is to set out a framework for early engagement and agreement on methods for protecting and/or relocating assets, and managing the adverse effects of working in close proximity to existing and authorised water and wastewater assets.*
- (b) *To achieve the objective, the WWMP shall include methods to:*
 - (i) *manage the effects of construction works on existing water and wastewater assets.*
 - (ii) *provide a process for the relevant Network Utility Operator to review and provide feedback on detailed designs developed by the Requiring Authority where those detailed designs involve modifications to, or relocation of, existing bulk/transmission water and wastewater assets;*
 - (iii) *maintain safe operational access for maintenance at all reasonable times and for emergency works at all times during construction activities and operation.*
 - (iv) *protect, and where reasonably necessary to accommodate the Project, relocate existing network utilities in consultation with the relevant Network Utility Operator;*
 - (v) *identify and map all existing and authorised network utilities within or adjacent to the designation, classify asset criticality, and set out protection, support, monitoring and (if required) relocation methodologies for those assets;*
 - (vi) *specify programme-level coordination, including indicative long-lead notice and staging arrangements for works that may require outages or complex interfaces, with a mechanism for the Requiring Authority and Network Utility Operator to agree refinements based on risk and detailed design; and*
 - (vii) *set out emergency response and escalation protocols, including 24/7 contacts and procedures to secure, isolate and restore service in the event of an incident affecting a network utility.*
- (c) *The WWMP shall be prepared in consultation with the relevant Network Utility Operator who have existing or authorised assets that are directly affected by the Project.*

(d) The WWMP shall describe how any comments from the relevant Network Utility Operator(s) in relation to their assets have been addressed.

Advice note: Nothing in this condition limits or replaces requirements under the Government Roadway Powers Act 1989, the Utilities Access Act 2010 and associated National Code of Practice for Utility Operators' Access to Transport Corridors, or any approvals reasonably required by a Network Utility Operator for works over, near to, or affecting its assets.

Advice note: There may be opportunities for upgrading water and/or wastewater assets as part of these works. The WWMP does not deal with the process for cost sharing and delivery of those upgrades. This will be addressed separately between the Requiring Authority and Network Utility Operator in accordance with relevant legislation and processes.

Conclusion

Watercare is supportive of NZTA's approach to engagement and consultation to date and looks forward to this continuing. Watercare seeks very targeted conditions which enable the Project to proceed while protecting existing assets, preserving the ability to deliver works authorised by Watercare's existing designations, and encouraging practical coordination around future Watercare projects.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'A' followed by a long horizontal stroke.

Anna Jennings

Major Developments

Watercare Services Limited