

23 April 2026

Adonica Giborees
Principal Project Lead – Premium Resource Consents
Auckland Council
[REDACTED]



Dear Adonica,

FTAA-2512-1158 (BUN60460864) – Downtown Carpark Site Development
2 Lower Hobson Street, 29 Customs Street West, 188 Quay Street, Auckland Central.

Introduction

Watercare Services Limited ("Watercare") appreciates the opportunity to comment on the Downtown Carpark Site Development Fast-track Application ("Application") submitted under the Fast-track Approvals Act 2024 ("Act").

The Application proposes to demolish the existing Downtown Carpark Building and develop an approximately 170,000 square metre gross building area mixed-use commercial and residential precinct comprising 2 towers (approximately 55 levels and approximately 45 levels, respectively), 3 podium buildings, and a laneway network for commercial, residential, retail and hospitality space. The site will also include a new civic space and a four-level basement carpark.

Watercare has reviewed the Application submitted by Precinct Properties New Zealand Limited.

The comments in this letter are based on the Application as submitted to date, including the relevant lodged documents:

- AEE (DCSD Fast-Track AEE_18 December version)
- Appendix 19_Infrastructure Concept Design Report
- Meeting minutes (page 22) of Appendix 21_Consultation Summary.
- Appendix 24_Proposed Consent Conditions

Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

Watercare is New Zealand's largest provider of water and wastewater services, operating as a substantive council-controlled organisation owned by Auckland Council with the 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.

Watercare is required to manage its operations efficiently with a view to keeping overall costs at minimum levels while maintaining long-term asset integrity, subject to economic regulation under the Watercare Charter with oversight by the Commerce Commission as the appointed Crown Monitor, and must give effect to relevant aspects of Council's Long-Term Plan and act consistently with other Council plans and strategies including the Auckland Plan 2050 and FDS.

Through its annual Statement of Intent responding to Council's Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes by collaborating with the wider Council group to support areas of growth identified by Council, acting consistently with Council's FDS for major infrastructure development for FUAs, ensuring alignment of infrastructure projects with other utilities, fully recovering growth costs so that growth pays for growth, and abiding by the Statement of Expectations of Substantive Council Controlled Organisation's (CCOs) which requires working with Council and other CCOs to achieve the outcomes and objectives set out in the Auckland Plan 2050.

Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- DCSD Fast-Track AEE_18 December version
- Appendix 19_Infrastructure Concept Design Report
- Appendix 21_Consultation Summary Report 18 December version
- Appendix 24_Proposed Consent Conditions

Watercare's comments

The Downtown Carpark is currently serviced by the public wastewater and water supply network. However, the application involves a significant increase in demand on both the water and wastewater networks. The following constitutes the water and wastewater servicing proposal from the Applicant.

Water supply

The Applicant proposes two separate connection points. These are:

- Connection 1 – Lower Hobson Street: Residential demand of 6.1 L/s
- Connection 2 – Customs Street West: 14.2 L/s for commercial use plus 58 L/s for fire protection

Hydraulic modelling has confirmed that no issues are identified with connection 1. For connection 2, the 175mm watermain exceeds the recommended unit head loss limit (3m/km) as set in the Auckland Code of Practice for Land Development and Subdivision (**CoP**). However, the maximum simulated head loss from this development is approximately 6m/km. This is considered practically acceptable.

It is noted that break tanks are incorporated into the development to significantly reduce peak flow rates, as outlined in Appendix 19 – Infrastructure Concept Design Report. There is an opportunity to size the break tanks in conjunction with the fire protection requirements to further attenuate peak demands, noting that the fire protection flows will be sourced from Customs Street West cast iron main installed in 1915. Given the age of this CI main and potential reduced hydraulic performance, a cautious approach is warranted, and the provision of appropriately sized break tanks would assist in managing peak demands and reducing full reliance on the existing asset during fire episodes.

In summary, the two proposed connections can be approved. While connection 2 results in unit head loss exceeding guideline limits, the predicted head loss remains within a level that is operationally acceptable.

Wastewater

The existing downstream wastewater network servicing the site via Lower Hobson Street and Quay Street has no available capacity to accommodate additional wastewater flows generated by the proposed development. Accordingly, alternative solutions must be investigated.

The applicant has proposed several options for the provision of wastewater services. Watercare considers that option 2 (Quay Street Duplication) is not appropriate due to the high construction difficulty within Quay Street and the lack of Auckland Transport (AT) support. There is also capacity constraint further downstream of this network. Option 3 (On-Site Storage / Off-Peak Pumping) is also not appropriate as this does not comply with Watercare Code of Practice. Therefore, option 2 and option 3 are considered not appropriate. Options 1 and 4 are considered most appropriate.

Option 1

Option 1 involves connecting the development to the Fanshawe Street Pump Station at 130 Fanshawe Street.

The Fanshawe Street Pump Station cannot accommodate the wastewater flows from the development without an upgrade.

Watercare is currently investigating the feasibility of upgrading the Fanshawe Street Pump Station and the extent and timing of any potential upgrades is unknown.

If an upgrade to the Fanshawe Street Pump Station is feasible, Option 1 is considered a viable option.

However, capacity of the local network that connects the development to the Fanshawe Street Pump Station may require upgrades. This must be assessed at the detailed design stage. Any upgrades to the local network will be at the cost of the developer.

Option 4

Option 4 involves constructing a new local pump station located within the future development site following demolition of the Hobson Street overbridge.

The local pump station would discharge to the Orakei Main Sewer.

Watercare considers that this solution may be viable and may provide additional network benefits by providing opportunity to divert more flow from the area. This will be explored through detailed design, if this option is selected.

Further investigation is required to determine the proposed discharge point to the Orakei Main Sewer and proposed pipe route.

The new pump station must meet all Watercare design, operational and safety requirements, including provision for maintenance access, emergency storage, odour control and appropriate truck turning circles without the need for traffic control.

Recommendation

Watercare recommends that any decision made by the expert panel protects the public water and wastewater networks from adverse effects arising from increased demand and constrained downstream capacity. It is recommended that options 1 and 4 for wastewater servicing are continued to be developed by the applicant in consultation with Watercare and that final water and wastewater servicing arrangements are approved by Watercare prior to engineering plan approval, with any necessary network upgrades implemented at the developer's cost.

Proposed conditions

Watercare has reviewed the proposed conditions and recommends the below amendments.

Condition	Commentary
56 Fire Hydrant Test At the architectural building consent lodgement, the consent holder must submit to the council a fire hydrant test(s) and accompanying report prepared by a suitably experienced and qualified engineering professional that certifies that there is adequate available water pressure for the development that meets the criteria of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZPAS 4509:2008. The results of the fire hydrant test(s) and accompanying certification report must be prepared in accordance with the SNZ PAS 4509:2008, Table 1 (noting that the development is sprinklered).	Add new condition: <u><i>"The consent holder must pursue the installation of break tanks as outlined in Appendix 19 – Infrastructure Concept Design Report, with the design developed in conjunction with fire protection requirements"</i></u> Add advice note: <u><i>While the area can meet the required fire protection demands, given the age (approximately 110 years) of the watermain at the proposed sprinkler connection point, it would be prudent to incorporate fire flows into the break tank design to help attenuate peak fire flow demands during fire events.</i></u>
77 Wastewater The consent holder must design and construct connections to the public wastewater reticulation network to serve the development in accordance the requirements of the wastewater utility service provider. Certification from a suitably qualified civil engineer that works have been satisfactorily undertaken must be provided at the completion of the works to the Council.	Add new condition 78: <u><i>The consent holder must obtain written approval from Watercare on the wastewater servicing infrastructure to be submitted as part of the application for engineering plan approval with Auckland Council.</i></u> Add new condition 79: <u><i>The consent holder will be responsible for designing, constructing and funding any</i></u>

		<u>local network upgrades, in accordance with the Code of Practice, required to facilitate the agreed option under condition 78.</u> Add new advice note: <u>Watercare will not accept options 2 and 3 as detailed in appendix 19 of the application formally received by the Environmental Protection Authority on 7 November 2025 as viable solutions.</u>
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Conclusion

Watercare considers the proposal raised important wastewater servicing matters that require resolution to ensure the ongoing performance, resilience and protection of the public network. Continued collaboration with Watercare to confirm appropriate servicing solutions and associated conditions will be necessary to achieve the outcomes required to enable redevelopment of the Downtown Carpark.

Yours faithfully,



Anna Jennings
Manager – Major Developments

Watercare Services Limited