

4 August 2025

To: The Panel for the Sunfield Project
substantive@fasttrack.govt.nz



Re: Watercare comments on the Sunfield Project

Introduction

1. Watercare Services Limited (**Watercare**) appreciates the opportunity to comment on the Sunfield Fast-track Application (**Application**) submitted under the Fast-track Approvals Act 2024 (**Act**).
2. The Application proposes a large-scale mixed-use development featuring approximately 3,854 dwellings, three retirement villages totalling around 600 units, a 7.5-hectare town centre, 46 hectares of retail, healthcare, and educational facilities, and 25.6 hectares of parks and reserves.
3. The Application covers 244.5 hectares of rural land located between Takanini and Papakura (**Sunfield Site**). Of this, 57 hectares are zoned Future Urban Zone (**FUZ**), while the remaining 187 hectares are zoned Rural – Mixed Rural Zone (**MRZ**). The FUZ portion is planned for live zoning under Auckland Council's Future Development Strategy (**FDS**) no earlier than 2050.
4. Watercare has reviewed the Application submitted by Winton Land Limited (**Applicant**) and opposes the proposal for the reasons outlined below.
5. The comments in this letter are based on the Application as submitted to date, including the relevant lodged documents:
 - Sunfield Fast-track Approval Act 2024 Substantive Application Planning Report, prepared by Tattico, dated March 2025;
 - Attachment 2: Sunfield Planning Report – Draft Conditions, dated March 2025;
 - Three Waters Strategy Report, prepared by Maven, dated February 2025;
 - Sunfield Fast Track Application – 3 Waters Review, prepared by McKenzie & Co, dated January 2025; and
 - The Applicant's memorandum (Ref. 215010) Re: Response to Watercare – FTAA-2503-1039 Sunfield Proposal (BUN60447430), prepared by Will Moore, Director – Maven Associates, dated 15 July 2025.
6. Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

7. Watercare is New Zealand's largest provider of water and wastewater services. It is a substantive council-controlled organisation (**CCO**) under the Local Government Act 2002 owned by Auckland Council. As Auckland's water and wastewater services provider, Watercare has a significant role in helping Auckland Council achieve its vision for the city.
8. Watercare's purpose, embodied in the Māori whakatauki (proverb) below, reflects the connection between our services and the wellbeing of our community and the local environment:

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.

9. Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with the effective conduct of its undertakings and the maintenance of the long-term integrity of its assets.
10. Watercare is subject to economic regulation under the Watercare Charter (**Charter**). The Charter imposes minimum service quality standards, financial performance objectives and an interim price-quality path. Regulatory oversight is held by the Commerce Commission as the appointed Crown Monitor. Subject to the Charter, Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) (**AUP(OP)**), the Auckland Plan 2050 and the Auckland Future Development Strategy 2023-2053 (**FDS**).¹
11. Auckland Council's annual Letter of Expectation (**LOE**) sets out the Council's priorities and expectations across all CCOs, and expectations specific to Watercare. Watercare's annual Statement of Intent (**SOI**)² responds to the LOE and publicly states its activities and intentions for the next three year period, and how they contribute to the Council's objectives. The SOI provides an opportunity for Council to influence the direction of Watercare and provides a basis for the accountability of performance. It also outlines how Watercare will act consistently with the relevant aspects of Council plans and strategies.
12. Relevant commitments in relation to servicing growth in the 2024-2027 SOI include:
 - Watercare contributes to the 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 future urban areas (**FUA**),
 - ensuring Watercare works with Council, Auckland Transport, NZTA Waka Kotahi and other utilities to align infrastructure projects;
 - Aligning with the Council's position in relation to Private Plan Changes that do not conform with the FDS, supporting Council in rejecting or submitting in opposition to such changes;
 - Alignment of the Watercare Asset Management Plan (**AMP**) with the FDS, including major infrastructure development for FUAs;
 - Fully recovering growth costs so that growth pays for growth; and

¹ Local Government (Auckland Council) Act 2009, s58.

² A requirement under the Local Government Act 2002.

- Abiding by the Statement of Expectations of Substantive CCOs (July 2021) (**SoE for CCOs**).

13. Under the SoE for CCOs Watercare is required to:

- Work with Council and other CCOs to align activities to achieve the outcomes set out in the Auckland Plan 2050; and
- Collaborate across the Council group to achieve the objectives and priorities of the Council as set out in the Auckland Plan 2050 and its supporting strategies and plans.

Application Water and Wastewater Servicing Summary

14. The Sunfield Site is not currently serviced by the public wastewater or water supply network. The following constitutes the water and wastewater servicing proposal from the Applicant.

Water supply

15. The Applicant proposes to establish a new potable water supply network, which will require a connection to the nearest Bulk Supply Point (**BSP**). Their preliminary assessments have identified two suitable BSPs. The two BSPs identified by Applicant are as follows:

- a. Airfield #1; or
- b. Porchester Road.

16. The Applicant's water demand calculations estimate an average daily demand of approximately 70.56 L/s, with peak day demand expected to reach 85.84 L/s.

Wastewater

17. The Applicant proposes a wastewater system utilising a Low-Pressure Sewer (**LPS**) design, aimed at minimising peak wet weather flows and addressing risks related to inflow and infiltration, given the site's low-lying topography and high-water table. The LPS is proposed to discharge flows to the downstream Takanini Branch Sewer.

Wastewater discharge is proposed to be limited to allowable levels based on existing network capacity, facilitating accommodation of up to 4,000 residential units and corresponding commercial land uses while ensuring compliance with downstream flow standards. The LPS would operate under a private ownership model, with homeowners assuming responsibility for on-site infrastructure and management of their pumping equipment to ensure effective operation of the system.

Watercare's position

Implications for Watercare of Applicant's servicing proposals

18. Watercare's bulk infrastructure programme is planned, funded, and sequenced in line with the Auckland Plan 2050, the Auckland Council Development Strategy (previously the Future Urban Land Supply Strategy 2017 and more recently the FDS), the Auckland Council Growth Scenario (previously i11v6 and more recently AGS23v1) (**AGS**), and the AUP(OP).

19. The Sunfield FTAA is predominantly located beyond the RUB, incorporating only a small area of FUZ land which is programmed for 2050+. Therefore, it is not anticipated for development by the AUP(OP), the FDS, or the AGS.

20. Watercare plans for and supports areas of urban growth identified by the Council, which excludes rural zoned land, in accordance with our obligations.
21. As an infrastructure provider, Watercare needs to plan for future development. It is necessary that the development of future urban areas aligns with the sequencing and timing of Auckland Council's long-term planning documents.
22. While Watercare remains open to exploring developer-funded solutions for out-of-sequence development, Watercare is unlikely to support development that may impact Watercare's ability to deliver its planned infrastructure programme for development of existing live zoned land and sequenced growth or result in reprioritisation or reallocation of funding in Watercare's Asset Management Plan (AMP).
23. Development of FUZ areas ahead of the completion of bulk infrastructure required to support growth in those areas exacerbates infrastructure capacity issues in the existing live zoned areas resulting in environmental impacts (e.g. from a wastewater perspective, increased frequency and volume of untreated wastewater overflows and from a water perspective, levels of water pressure below adequate levels of service for key purposes such as firefighting).
24. Where out of sequence development is approved and land is developed decades earlier than anticipated under the FDS and the AGS, the actual growth rate within a geographic catchment may become more rapid than forecast by the AGS projection, causing the capacity of Watercare's infrastructure providing for that catchment to be taken up faster than the programmed or future upgrades can be delivered.
25. Funding on its own does not ensure certainty of providing bulk infrastructure earlier than planned. Other matters such as resourcing, statutory approvals, and construction timeframes constrain the ability to bring forward bulk infrastructure ahead of the planned programme. Given the fundamental trade-offs involved, it is not always possible to reallocate or bring forward investment to these areas. Inevitably, to reallocate investment to a FUZ area ahead of schedule, other projects such as infrastructure for other growth areas, or renewals and upgrades required to ensure level of service and/or improved environmental outcomes would need to be deprioritised. Where connections are granted, infrastructure capacity may be taken up faster than planned, resulting in constraints to growth in live zoned areas (i.e. areas with operative urban zoning). This would place Watercare in an unacceptable position.

Feasibility of bulk infrastructure servicing

26. Notwithstanding the position outlined above, it is important to gain a clear understanding of the high-level technical feasibility of servicing the proposed out-of-sequence development. The following comments address the feasibility of water supply and wastewater servicing for the FUZ components of the Sunfield FTAA (noting again that as a policy Watercare does not provide water supply and wastewater servicing to rural zoned land).

Water supply – FUZ land only

27. As noted above, the Applicant proposes the establishment of a new potable water supply network. This will require a connection to the nearest BSP, with the Applicant's preliminary assessments identifying two suitable BSPs.
28. Both the Airfield Road BSP and Porchester Road BSP identified by the Applicant are at full capacity and cannot accommodate new connections.

29. A preliminary assessment undertaken by Watercare indicates that there is sufficient capacity within the bulk water supply network to supply development of the 57 hectares of FUZ only without precluding development of existing live zoned land. However, the challenge at this location relates specifically to limitations in accessing the transmission capacity.
30. The construction of a new BSP to access the bulk water supply available from the Waikato-1 Watermain is restricted due to the shutdown limitations for this watermain. The next scheduled shutdown will occur in late 2025 at Quarry Road. Following this, Watercare will not allow any further shutdowns of the Waikato-1 Watermain until the Waikato-2 Watermain is operational.
31. Following recent shutdowns on the Waikato-1 Watermain, Watercare has experienced recurring difficulties in restoring adequate storage levels in the Redoubt Reservoir Complex. An operational decision has since been made to defer all non-essential shutdowns for the Waikato-1 Watermain until the Waikato-2 Watermain is commissioned.
32. The Waikato-2 Watermain is a new 50km pipeline to be delivered as part of the Waikato Supply Programme which has a current estimate of \$760M. The Waikato Supply Programme is partially funded within the 10 year Watercare Business Plan (currently 2025-2035). The Waikato-2 Watermain is currently in the feasibility stage, with construction anticipated to commence in 2030 and commissioning by the end of 2034. However, there is uncertainty associated with this completion date as various project stages, such as concept design and securing of designations and resource consents, have not yet been completed.
33. As such, while there is theoretically capacity to service the FUZ component of the Sunfield FTAA with potable water, that capacity cannot be realised without the completion of the Waikato-2 Watermain and developer funding of a new BSP from the new Waikato-2 Watermain connecting to the Sunfield FTAA. If the Application were to proceed on this basis, the cost of this infrastructure would need to be borne by the Applicant (in around 2034) and subject to an Infrastructure Funding Agreement with Watercare.

Wastewater – FUZ land only

34. Upgrades will be required to the transmission infrastructure in order to service the FUZ land within the catchment. This is not currently scheduled in the AMP as the land release is outside the 20-year AMP planning period. This assessment takes into account the potential of the proposed LPS system (addressed further below) to limit peak flows.
35. The proposal would require an extension of the Takanini branch sewer, which would include upgrades to the existing sewer line and also upgrades to the Southern Interceptor. These upgrades are not planned or funded in Watercare's 10 year AMP and would be dependent on the South-West Interceptor Duplication, which is a planned upgrade but is scheduled for delivery in the late 2030s.
36. Watercare considers the Applicant's proposed LPS to manage the significant wastewater load to be unacceptable. Watercare's Code of Practice (**COP**) stipulates that servicing should predominantly rely on a gravity network unless specific conditions apply. The COP on page 56 under C5.3.12.3.1 states: "*A low pressure sewer system should in general be considered as limited for up to 50 dwelling units due to system risk to customer service under power failure. A combination of systems or a gravity system with pump station may be more practical.*"
37. The proposed development includes 3,854 dwellings, plus industrial, commercial, and school connections. This far exceeds the recommended LPS threshold and introduces significant operational risk. The documentation provided by the Applicant lacks adequate justification for the proposed use of

an LPS over a gravity solution. Moreover, it appears unlikely that an LPS would sufficiently reduce flow from the site to negate the need for upgrading the downstream infrastructure. The LPS system is therefore highly unlikely to be accepted for vesting by Watercare.

38. A further constraint on wastewater servicing is wastewater treatment capacity. The ability for the Mangere Wastewater Treatment Plant (WWTP) to service out of sequence and unanticipated growth is constrained by the existing resource consent which includes as a condition an average daily flow limit. The existing resource consent expires in 2032. Watercare will need to reconsult the discharge, which will need to provide for future growth in line with Council's growth forecast. This process will also confirm the discharge location and effluent quality which will inform any future upgrades. There are no upgrades, outside those planned for treating flows from the Central Interceptor, anticipated between now and the end of the existing consent. A new discharge consent will determine future scale and timing of wastewater upgrades. Additional unanticipated wastewater flows as described in this PPC may require upgrades to be brought forward, which would need to be done in accordance with the existing and future discharge consent.

Bulk Infrastructure Funding

39. As noted above, while Watercare remains open to exploring developer funded solutions, any such solution that would enable out-of-sequence development and would not impact Watercare's ability to fund and deliver infrastructure that has been committed to or prioritised may not always be technically feasible.
40. Funding on its own does not ensure certainty of providing bulk infrastructure earlier than planned. Other matters such as, but not limited to, resourcing, statutory approvals, and construction timeframes constrain the ability to bring forward bulk infrastructure ahead of the planned programme.
41. The scale and cost of infrastructure that would be required to be expedited by any infrastructure agreement to enable the Sunfield Project is anticipated to be substantial, and significantly more than the Applicant has identified. Given the scale, complexity and likely significant cost of the bulk infrastructure upgrades required to support development of the Site, an infrastructure funding agreement to support this Application is unlikely to be feasible or beneficial.

Watercare's response to July Maven Memo

42. Watercare has received a response to the Council's request for "information gaps" under Section 67 of the FTAA which includes a memorandum from Will Moore, Director – Maven Associates dated 15 July 2025 (**July Maven Memo**). Watercare responds to the July Maven Memo as follows.

Relationship with Veolia

43. The July Maven Memo inaccurately describes the relationship between Watercare and Veolia as one of agent and principal.³
44. Watercare holds contractual obligations under its Service Level Agreements and wholesale arrangements with Veolia for Watercare to provide bulk water and wastewater services. These obligations are governed by operational protocols, infrastructure availability, and the terms of the

³ July Maven Memo top of page 2.

relevant servicing agreements. Accordingly, Watercare is responsible for advising on the capacity of the bulk water and wastewater networks in South Auckland. Veolia, as a retail provider, is responsible for managing local networks and customer connections.

45. The correspondence from Veolia dated 12 April 2024 and attached to the July Maven Memo does not represent official Watercare advice. In addition, it concerns a separate matter—the withdrawn Private Plan Change (PPC) for 55 Cosgrove Road—and is not relevant to the current Application, particularly in relation to the 187 hectares of rural zoned land.

Wastewater Comments

46. Watercare raises the following points where the July Maven Memo contains inaccuracies with respect to wastewater:
- a) Maven states that *“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.”* The Council’s section 67 memo dated 16 June 2025 (prepared with input from Watercare) and these comments are clear that an LPS at the scale proposed is unacceptable, as per Watercare’s CoP. Furthermore, the Applicant has also failed to provide adequate justification as to why a gravity sewer system or on-site (private) servicing is not feasible.
 - b) Maven’s assumption that the downstream wastewater treatment plant (**WWTP**) can accommodate approximately 4,000 additional DUEs is unsubstantiated. Watercare has not provided any advice regarding headworks requirements. Notably, Watercare is currently revising the Mangere WWTP catchment model, which only accounts for planned and existing urban development.
 - c) The claim that “downstream upgrades are not required”⁴ is incorrect. Council’s section 67 memo confirms that the existing downstream infrastructure cannot support the proposed development of the FUZ land, let alone the additional 187 hectares of rural land.

Water Supply Comments

47. Watercare notes the following where the July Maven Memo is inaccurate with respect to water supply:
- a) Maven states 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”. Watercare’s S67 memo and these comments confirm that the two BSPs proposed by the Applicant are currently operating at full capacity and cannot support additional development.
 - b) Maven states that access constraints are readily resolved through “Developer-funded interim BSPs or live-tap connections that do not require watermain shutdowns”. Live-tap solutions are not acceptable on strategic transmission infrastructure such as the Waikato-1 Watermain due to unacceptable risk of failure. Further all new BSPs on major transmission watermains must be accompanied by a new line valve to provide operational flexibility for these major assets. Installation of a line valve is not possible when installing a live-tap BSP.
48. From a water supply perspective, any development of Sunfield must be staged to align with available transmission network capacity, specifically not before the Waikato-2 Watermain is operational in approximately 2034.

⁴ July Maven Memo towards bottom of page 2.

Concluding Comments on July Maven Memo

49. In response to the July Maven Memo's concluding remarks, it will suffice to note that Watercare disagrees with Maven's conclusions for the reasons given above.

Conclusion

50. Watercare plans for and supports areas of urban growth identified by the Council, which excludes rural zoned land, in accordance with our obligations.
51. Watercare has assessed the capacity of the existing and planned bulk infrastructure to support the development of the 57 hectares of FUZ land only ahead of the 2050+ timing in the FDS. The earliest that connections for the FUZ land could theoretically be provided would be from the late 2030s, however even at that time these connections would be reliant on the Applicant funding the identified unplanned bulk wastewater upgrades and reliant on the delivery of planned but unfunded bulk water supply and bulk wastewater projects. Further, additional unanticipated wastewater flows as described in this PPC may require upgrades to the Mangere WWTP to be brought forward, which would need to be done in accordance with the existing and future discharge consent.
52. Given that connections to the public wastewater and water supply networks will not be available for the FUZ land at the earliest until the late 2030s – and even then, remain uncertain due to the planning and funding status of the required projects and reliance on Applicant-funded bulk wastewater upgrades – and because the 187 hectares of rural land will not be able to be provided with connections, Watercare may refuse any requests for water supply and wastewater connections for the proposal. The Applicant will therefore need to demonstrate clear, technically robust, and sustainable permanent private servicing solutions for both potable water and wastewater. The Application should not be approved on an assumption of public capacity being available.
53. As matters stand, Watercare opposes the Application.
54. If the Application is granted notwithstanding Watercare's opposition, Watercare recommends the decision includes conditions requiring a permanent private water supply and wastewater servicing solution and that the current conditions relating to public servicing are removed. Amendments to the Proposed Conditions are annexed to these comments and made without prejudice to further comments which may be made if the Panel decides to circulate draft conditions for comment. Watercare emphasises that it will not accept any private infrastructure / assets for vesting.
55. Watercare is open to further discussions with the Applicant.

Yours faithfully,



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AMENDMENTS TO PROPOSED CONDITIONS

Black Text – Applicant's proposed conditions

Red Text – Watercare's proposed amendments

Additions underlined, deletions ~~struck-through~~

Three Waters Infrastructure

117. Prior to the occupation of any building all the necessary pipes and ancillary equipment for that building must be supplied and laid to divert, relay and upgrade existing public stormwater, ~~wastewater and water supply~~ lines and to provide the building with stormwater, ~~wastewater and water supply~~ connections to the reticulated networks in general accordance with the plans and information referenced in Condition [3].

Condition 120 – delete references in staging table to connections to public sewer and water supply networks and replace with appropriate specifications for private servicing.

162. The engineering plans submitted for approval must detail all works associated with, and be in accordance with current Council Engineering Standards, including but not limited to;

- Public Stormwater Reticulation
- ~~Public Wastewater Reticulation~~
- ~~Public Water Reticulation~~
- Public Roads
- Public Reserves

Wastewater Reticulation Networks

167. The Consent Holder must design and construct connections to a private ~~the public~~ wastewater reticulation network to serve the development with a Low Pressure Sewer system, in accordance with ~~the requirements of the wastewater utility provider and~~ the approved engineering plans as required by Condition [XX]. Certification from ~~the utility provider~~ a suitably qualified and experienced engineer that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.

~~Advice Notes:-~~

- ~~Acceptable forms of Evidence from the Utility Providers include a Certificate of Acceptance.~~
- ~~Alterations to the public wastewater reticulation network require Engineering Plan Approval. Additional approval is required from Watercare as part of the Engineering Plan Approval Process.~~
- ~~Public connections are to be constructed in accordance with the Water and Wastewater Code of Practice.~~

Water Reticulation Networks

168. The Consent Holder must design and construct connections to ~~the public~~ a private water reticulation network to serve the development in accordance with ~~the requirements of the water utility provider and~~ the approved engineering plans as required by Condition [XX]. Certification from ~~the utility provider~~ a suitably qualified and experienced engineer that works have been satisfactorily undertaken must be provided when applying for a certificate under the section 224(c) of the RMA.

~~169. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under the section 224(c) of the RMA.~~

~~Advice Notes:-~~

- ~~• Acceptable forms of evidence from the Utility Providers include a Certificate of Acceptance.~~
- ~~• Alterations to the public water reticulation network require Engineering Plan Approval. Additional approval is required from Watercare/ Veolia as part of the Engineering Plan Approval Process.~~
- ~~• Public water supply is required to ensure an acceptable water supply for each lot, including for fire-fighting purposes.~~
- ~~• Public connections are to be constructed in accordance with the Water and Wastewater Code of Practice.~~
- ~~• Plans approved under resource consent do not constitute an Engineering Plan Approval and should not be used for the purposes of constructing public reticulation works in the absence of that approval.~~

Condition 175 – delete references in staging table to connections to public sewer and water supply networks and replace with appropriate specifications for private servicing.

Water and Wastewater Reticulation Networks

205. The Consent Holder must design and construct connections to ~~the public~~ private water and wastewater reticulation networks, to serve the lots, ~~in accordance with the requirements of the water and wastewater utility providers~~. Certification from ~~the utility providers~~ a suitably qualified and experienced engineer that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c).

~~Advice Notes:-~~

- ~~• Acceptable forms of evidence from the utility providers include a Certificate of Acceptance.~~
- ~~• Alterations to the public water and wastewater reticulation networks require Engineering Plan Approval. Additional approval is required from Watercare as part of the Engineering Plan Approval process. This can be combined with an Engineering Plan approval for the underlying superlot subdivision if applicable.~~
- ~~• Public connections are to be constructed in accordance with the Water and Wastewater Code of Practice.~~

Consequential Changes

Any other consequential changes needed to the draft conditions to give effect to the above and to provide for permanent private water and wastewater servicing, as opposed to public servicing.