

31 July 2025

By Email:

[REDACTED]
[REDACTED]

Russell Butchers / Karl Anderson
Planning & Resource Consents
Auckland Council
Auckland 1142

Dear Russell and Karl,

VEOLIA COMMENT ON SUNFIELD FAST-TRACK PROPOSAL

1. This letter provides Veolia Water Services (ANZ) Pty Ltds' (**Veolia**) comment on the Sunfield Fast-track Approvals Act 2024 application (**Application**) by Winton Land Limited (**Applicant**).
2. In preparing this letter, Veolia has reviewed:
 - (a) The Three Waters component of the Infrastructure Report prepared by Maven in support of the Application dated 7 February 2025;
 - (b) The McKenzie & Co Three Waters Review dated 24 February 2025; and
 - (c) The memorandum from Maven in relation to Section 67 of the Fast-track Approvals Act 2024 dated 15 July 2025 concerning concerns raised by Watercare Services Limited (**Watercare**).
3. Veolia is responsible for operating the retail water and wastewater infrastructure in Papakura under a Franchise Agreement with Watercare. This includes the area covered by the Sunfield site.
4. Watercare is responsible for bulk water and wastewater infrastructure capacity delivery and planning. Veolia defers to Watercare entirely on those matters and this letter should be read alongside the comments from Watercare on this Application.
5. However, Veolia makes the following comments on the email chain which is attached to the 15 July Maven memorandum in respect of bulk water and wastewater infrastructure capacity:
 - (a) The Maven memorandum incorrectly describes Veolia as Watercare's agent. Veolia is not Watercare's agent with respect to bulk water and wastewater infrastructure capacity matters.
 - (b) This email chain from April 2024 relates to a proposed Plan Change (**PC**) at 55 Cosgrave Road and 508 Old Wairoa Road for 1550 DUE. It does not relate to the current Application under the Fast-track Approvals Act 2024 for approximately 4000 DUE.
 - (c) While Veolia inquired with Watercare as requested by Maven regarding capacity in the context of the PC, and relayed preliminary advice regarding capacity, that email did not amount to formal confirmation by Watercare of capacity. It was also caveated on the basis that capacity would need to be re-assessed if the dwelling yield changed.

6. In respect of the local network, the Applicant proposes to service the development with a low-Pressure Sewer (**LPS**) system. This is not supported by Veolia due to long term maintenance requirements and the LPS conflicting with advice in Watercare's Code of Practice. To justify an LPS approach the Applicant would need to demonstrate an inability to provide a gravity wastewater network and a full justification for an alternative solution, including addressing arrangements for long term maintenance of an LPS.
7. In respect of conditions, and without prejudice to Veolia's further comments should the Panel circulate draft conditions, Veolia makes the following high-level comments that would need to be addressed in conditions, if the Application is granted:
 - (a) All of the water supply network proposed to be installed under the Application is considered local/retail network, and is therefore required to be constructed and funded by the developer in accordance with relevant technical standards and codes of practice.
 - (b) Retail water infrastructure will need to be accessible by vehicle and located in public areas.
 - (c) Retail wastewater infrastructure will need to be accessible by vehicle and subject to accessibility, may need to be located in public areas.

Yours faithfully,



Sanjeev Morar
Developments Manager
Veolia Water Services (ANZ) Pty Ltd