

23 April 2026

The Delmore Panel

Fast Track

substantive@fasttrack.govt.nz

Dear the Delmore Panel,

Delmore Fast-track Application

88 Upper Orewa Road, Upper Orewa 0992

Introduction

1. Watercare Services Limited ("Watercare") welcomes the opportunity to provide comments on the substantive Delmore Fast-track Second Application ("Application"), made under the Fast-track Approvals Act 2024 ("Act"). The purpose of this letter is to set out Watercare's position, relevant information and, notwithstanding Watercare's position, comment on conditions.
2. The Application seeks to enable the construction of a comprehensively planned residential development including approximately 1,213 dwellings comprising a mixture of dwelling types, one commercial super-lot, one residential superlot, two neighbourhood parks and a network of open space and ecological areas, roading and transport infrastructure, an on-site wastewater treatment plan and on-site water supply and treatment (in the event that connection to the public networks cannot be provided) and associated infrastructure ("Delmore Project"). The Applicant is proposing to undertake the development in two stages. The Delmore Project is located at 88, 130, 132 Upper Ōrewa Road and 53A, 53B and 55 Russell Road, Ōrewa ("the Site").
3. The Site is zoned Future Urban Zone (FUZ) under the Auckland Unitary Plan – Operative in Part (AUP) and is located in the Upper Orewa Future Urban Area (FUA) which is sequenced in the Future Development Strategy (FDS) to be development ready from 2050+. The listed infrastructure pre-requisites for the Upper Orewa FUA, as stated in the FDS, include the Army Bay Wastewater Treatment Plant (WWTP) Upgrade. However, it is important to note that, as expressly stated in the FDS, this is not an exhaustive list and may be subject to change as further strategic planning is developed¹. In the recently published Auckland Future Development Strategy 2023-2053 Monitoring Report dated December 2025 the following infrastructure pre-requisites have been identified for the Upper Orewa FUA in relation to water and wastewater²:
 - Army Bay WWTP Upgrade
 - Army Bay WWTP Stage 2 Upgrade
 - Stanmore Wastewater Pump Station (WWPS) and Rising Main (RM) Upgrade

¹ [Future Development Strategy](#), Appendix 6, page 35.

² <https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/plans/auckland-plan/ap-ds-monitoring-report.pdf>

- Orewa to Stanmore Trunk Network Upgrade (wastewater)
 - North Harbour Number 2 Watermain (NH2)
 - Orewa 3 Watermain.
4. The Application material for the Delmore Project identifies a number of options for water supply and wastewater servicing:
- (a) For wastewater:
- i. Option 1 involves a private low-pressure sewer (LPS) system that conveys wastewater to an onsite private wastewater treatment and disposal scheme.
 - ii. Option 2 utilises a LPS system which will connect to Watercare's network.
 - iii. Option 3 uses a LPS system to collect untreated wastewater and store it in a holding tank prior to tanker trucks collecting the raw sewage and trucking it to an off-site disposal facility.
- (b) For water supply:
- i. Option 1 is an on-site, private potable water supply system including four groundwater bores, a water treatment plan (WTP) and on-site reservoirs.
 - ii. Option 2 is a two-phase approach connecting to the existing public watermain adjacent to the site. Phase 1 is a connection to an existing main east of the site located on Grand Drive. Phase 2 is an additional connection to the south that is required at ~550 lots.
5. Watercare has been involved in pre-application discussions and correspondence with the Applicant. As part of this, Watercare provided information on the existing infrastructure capacity and what wastewater and water supply upgrades would be required to support the Delmore Project and the estimated timing of those upgrades.
6. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
- Assessment of Environmental Effects and Statutory Analysis dated 23/12/25,
 - Appendix 7: Consultation Overview Report dated 19/12/26,
 - Appendix 27: Water Wastewater and Utility Infrastructure Report dated 22/12/25,
 - Appendix 28: Water, Wastewater and Utilities Drawings dated 12/12/25,
 - Appendix 29: Delmore Water and Wastewater Treatment Plant Design Report dated 25/12/25,
 - Appendix 30: Wastewater Disposal Memorandum dated 18/12/25,
 - Appendix 31: Wastewater Discharge Assessment dated 19/12/25, and
 - Appendix 44: Proposed Consent Conditions.
7. Any amendment to the Application will require further review from Watercare.

8. Any infrastructure delivery dates provided in this letter are forecast dates only and are subject to change.

Watercare's purpose and statutory obligations

10. 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.
11. Watercare is required to manage its operations efficiently with a view to keeping overall costs at minimum levels while maintaining long-term asset integrity³, 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 as specified by the Council, including the FDS⁴. The current Letter of Expectation from the Mayor expressly states that "CCO plans and investment should be aligned with the Future Development Strategy...", and that the Council "expect[s] Watercare alignment with council's position in relation to... developments that do not confirm with the Future Development Strategy".⁵
12. Through its annual Statement of Intent responding to Council's Letter of Expectation⁶, 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.

³ Section 57 of [Local Government \(Auckland Council\) Act 2009 | New Zealand Legislation](#).

⁴ Section 58 of [Local Government \(Auckland Council\) Act 2009 | New Zealand Legislation](#).

⁵ Mayor of Auckland (Wayne Brown), Letter of Expectation for Statement of Intent 2026-2029 (18 December 2025).

⁶ [Watercare Services Ltd \(Watercare\) Statement of Intent, 2025-2028](#)

Watercare's position

Watercare's Growth Servicing Policy

13. As noted above, the Site is zoned FUZ under the AUP.
14. Watercare's Board-approved Strategic Direction for Providing Services to Support Urban Growth (approved May 2015) sets out the policies and principles for providing water and wastewater infrastructure to service growth. It is accompanied by an explanation of Growth Areas and Service Categories, which clearly states that "Future Urban Zones must become 'live' urban zones for services to be provided, regardless of funding provisions"⁷.
15. In line with this direction, Watercare does not provide water or wastewater connections to FUZ land.
17. Notwithstanding Watercare's position on servicing FUZ land, the below comments are provided in relation to the existing and future capacity of the bulk networks and the local network servicing requirements.

Development out of sequence with the FDS

18. Watercare does not support out-of-sequence development that puts pressure on Watercare to reprioritise or reallocate funding in the current Watercare Asset Management Plan (AMP) away from live zoned areas and sequenced growth. It is not possible for Watercare to immediately invest in areas that are developed out of sequence given its asset management planning requirements to be aligned with the FDS, economic regulation requirements, and resourcing and funding constraints.
19. Where out of sequence development is approved and land is developed decades earlier than anticipated under the FDS and the Auckland Growth Scenario (current version 2023 v1.1) (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. This directly impacts Watercare's ability to service existing customers and planned growth in already live-zoned areas.
20. 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.

⁷ 17 May 2015 Report to Watercare Board on Strategic Direction for Providing Services to Support Urban Growth, Attachment B: Growth Areas and Service Categories, Explanations and Definitions.

21. In addition, approval of out of sequence growth results in considerable, additional operational costs being brought forward to support the bulk infrastructure required, and newly vested local assets.
22. As an infrastructure provider, Watercare needs to be able to plan for future development and it is therefore necessary that development of FUAs is aligned with the sequencing and timing provided in the Council's long term planning documents (such as the FDS).

Wastewater

23. The Site is not currently serviced by the public wastewater network. As a future urban zone, Watercare does plan to provide service to this area in the future.
24. As noted, the Application refers to three wastewater options, with the proposed conditions enabling any of these options to be adopted.
25. **Option 1** involves a private LPS system that conveys wastewater to an interim onsite private WWTP. Treated wastewater is proposed to then discharge to land from the WWTP within the site, with a back-up system that diverts treated wastewater to a holding tank / fill point station for trucking away during dry periods. Treated wastewater is discharged to land (infiltration trench and irrigation zones) on-site or, during the dry, low flow period (summer) some of the treated wastewater is diverted to a holding tank at a fill point station at the south of the site at the bottom of road 1 where it is collected by tanker and disposed of at a licensed facility. A valve arrangement will be provided on the LPS to allow it to become part of the public network and connect to the eastern gravity reticulation in the future and ultimately discharge to the Army Bay WWTP. This option enables connection to the public wastewater network in the future when capacity is available.
26. Any comments on, or assessment of, potential permanent **private** water supply and/or wastewater servicing will be made by Auckland Council. Additionally, any private water supply and/or wastewater servicing would be subject to regulation by Taumata Arowai as the Water Services Regulator. However, it is noted that the provision of permanent private water/wastewater systems in the future urban zone will affect Watercare's planning, and may result in a down-size and/or loss of efficiency and economic feasibility of planned networks for the area, ultimately increasing the price of servicing for others in the area.
27. The Applicant indicates that wastewater may need to be trucked off-site and the Applicant has assessed the Rosedale WWTP and Pukekohe WWTP as having capacity to accept tanker truck discharges. However, due to there being no agreement with Watercare the Applicant has confirmed with Whangarei District Council that it can receive treated and untreated wastewater at its disposal facility.
28. While the Rosedale and Pukekohe WWTP's are equipped with facilities to receive wastewater from tankers, assuming Watercare would allow access to any additional tankers at these sites is incorrect. We have advised the applicant that neither of these sites is available. Watercare does not support any tankering of wastewater as an interim solution, whether treated or untreated, that would discharge to its public network and there is no general right of entry of wastewater tankers onto Watercare sites for disposal (Watercare's consent would be required).
29. Watercare does not support trucking / tankering of wastewater to a Watercare facility for the following reasons:
 - (a) Increased traffic associated with tankering operations can lead to disruptions to the local community including noise, odour, congestion, and safety concerns.

- (b) Tankering wastewater requires specialised tankers and trained personnel, leading to significant operational costs. The fuel consumption, monitoring, cleaning and equipment maintenance contribute to the overall high cost of tankering.
- (c) Wastewater from tank farms contains hazardous silt or sludge that requires regular cleaning via specialist Hydro Evacuation trucks and disposal at specialist waste facilities, adding cost and complexity.
- (d) Transporting wastewater over long distances has a high carbon footprint as there are only limited facilities that can receive the tankers in Auckland. There is also the risk of spills or leaks during transportation which can result in damage to the natural environment.
- (e) There is the potential for infiltration of stormwater into the wastewater network, particularly during heavy rainfall events. This can fill the tank farms in a very short period of time and requires increased tankering to empty the tanks. It carries risk of system failure and overflows.

30. For the avoidance of doubt, Watercare confirms that:

- (a) No part of its wastewater infrastructure, including the RO waste stream, will accept discharge from the Delmore Project's tankered effluent; and
- (b) It will not enter into any arrangement with the Applicant for tankering of waste to any of its facilities.

26. While the Applicant proposes to decommission the private WWTP and disposal area once connection to Watercare's network is available, this is not considered a reliable or supported outcome, due to the proposed design of the local network. All proposed options rely on a large-scale LPS system, which is not supported under the Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice) for developments of this size, due to associated operational and septicity risks, and its misalignment with the long-term network servicing plan for the area. In addition, public network capacity for the Delmore Project is not anticipated to be available until at least 2050, and Watercare cannot confirm future connection or asset acceptance. Accordingly, the proposed servicing must be treated as a permanent private solution and designed, consented, and operated on that basis, without reliance on a future connection to the public network.

27. In addition, Watercare does not support interim private systems for servicing residential subdivisions, which create multiple freehold titles and therefore multiple asset owners. This fragments responsibility for operation, maintenance, renewals and eventual decommissioning. From Watercare's perspective, this creates long-term uncertainty and risk: interim private systems may be inconsistently maintained, are difficult or impossible to integrate into the public network and often become permanent by default.

28. **Option 2** utilises a LPS system that pumps to a discharge manhole at the top of Grand Drive, which subsequently discharges to the existing public gravity wastewater reticulation on Grand Drive, east of the site, that ultimately discharges to the Army Bay WWTP.

29. The applicant's assessment of available public wastewater capacity is not supported by Watercare. Planned upgrades to the Army Bay WWTP are intended to service forecast growth and committed

developments in accordance with the AGS, and cannot be relied upon to accommodate out-of-sequence developments such as Delmore without adversely affecting the wider catchment, including existing live zones.

30. Reliance on an LPS-based network is also not acceptable. Watercare's Code of Practice advises against LPS systems of this scale due to operational and septicity risks, and the proposed approach is also inconsistent with current long-term servicing plans for the area. As a result, the reduced peak flows and discharge assumptions cannot be used to determine downstream network capacity.
31. In November 2024 there were approximately 4,000 connections available to the existing Army Bay WWTP for sites that had valid resource consents as at 14th November 2024 within the live zoned area. Since then, Watercare has connected approximately 1028 new dwellings (or equivalent). This number of connections has been updated as of 3 December 2025 from the original information sent to the Applicant in October 2025 which quoted 500 new connections. Watercare has implemented this management approach as we anticipate the connections will be allocated prior to the full upgrade of Army Bay.
28. Watercare's current model shows that the Stanmore WWPS has a capacity of 450L/s and currently receives a peak dry weather flow of 220L/s and a peak wet weather flow of 450-500L/s. For the Orewa WWPS, Watercare's modelling shows it currently has a capacity of 300L/s and receives a peak dry weather flow of 130L/s and a peak wet weather flow of 280L/s. Therefore, Watercare's existing transmission wastewater network, including the Orewa WWPS, the Orewa–Stanmore Wastewater Trunk Network, and the Stanmore WWPS and RM, are all programmed for upgrades prior to servicing any additional growth above that allowed for by the resource consents already granted.
29. Therefore, the following bulk wastewater pre-requisites are identified as being required to enable wastewater servicing of the Upper Ōrewa FUA, including the Site:
 - Army Bay WWTP Stage 1 Upgrade currently anticipated to be completed 2031.
 - Army Bay WWTP Stage 2 Upgrade, currently anticipated to be delivered in line with the FDS timing of 2050+;
 - Orewa to Stanmore Wastewater Trunk Network Upgrade, currently anticipated to be completed by 2033.
 - Stanmore Wastewater Pump Station (WWPS) and Rising Main (RM) Upgrade, currently anticipated to be completed by 2031.
30. **Option 3** uses LPS to collect untreated wastewater and store it in a holding tank prior to tanker trucks coming to collect the raw sewage and trucking it to an off-site disposal facility.
31. Watercare's position on trucking and tankering is covered in points 27- 30 above.

Water supply

32. The Site is not currently serviced by the public water supply network. As noted above, the Application refers to two options for water supply servicing.

33. **Option 1** is an on-site, private potable water supply comprising four groundwater bores, a WTP and two on-site reservoirs. Option 1 services Stage 1 of the development via two of the groundwater bores pumping to the WTP and then a booster pump pressurising the network. Stage 2 will be serviced by 2 further ground water bores also feeding into the WTP, and instead of using the booster pump to pressurise the system, it will be used to pump treated water to proposed reservoirs at a higher elevation to pressurise the network. The on-site infrastructure has been designed to enable future connection to the public network once capacity is confirmed as available.
34. Any comments on, or assessment of, potential permanent **private** water supply servicing will be made by Auckland Council. Additionally, any private water supply servicing would be subject to regulation by Taumata Arowai as the Water Services Regulator. However, it is noted that the provision of permanent private water/wastewater systems in the future urban zone will affect Watercare's planning, and may result in a down-size and/or loss of efficiency and economic feasibility of planned networks for the area, ultimately increasing the price of servicing for others in the area.
35. The Applicants proposed private water system, including the location of proposed reservoirs, is incompatible with Watercare's network servicing plan for the area which may preclude future connection to the public network.
36. Watercare notes that the same risks apply to interim water supply servicing as interim wastewater servicing outlined above, however there are likely to be higher operational and water safety risks associated with connecting a private serviced area to the public network at a future time. These risks, including significant water quality risks to connected customers, may mean the system needs to remain independent from the wider public network which may mean it becomes permanently private. Technical solutions to overcome these risks include super chlorination, flushing and water outage programme or complete duplication of the water supply network.
37. The Application does not set out whether the proposed private WTP, headworks and bores would be decommissioned prior to future connection to the public system. Watercare's preference, if the system is to connect to the wider public network in the future, is for the WTP, headworks and bores to be decommissioned prior to connection.
38. **Option 2** is a two-phase approach connecting to the existing public watermain adjacent to the site. Phase 1 is a connection to an existing main east of the site located on Grand Drive. Phase 2 is an additional connection in the south that is required at ~550 lots.
39. The existing bulk water supply network is limited in this area and does not have sufficient capacity to support the anticipated growth in the existing live zoned areas in addition to the Delmore Project. Watercare have proactively shared a recently published report on the remaining capacity of the NH1 and the risks of unanticipated growth in this area. The following bulk water supply pre-requisites are identified as being required to enable servicing of the Upper Ōrewa FUA, including the Site:
- The Orewa 3 Watermain scheme (transmission watermain, reservoir and pump station) which is currently anticipated to be completed by 2038 and is dependent on the completion of the North Harbour 2 (NH2) watermain;
 - The NH2 watermain, currently anticipated to be completed in 2034+.

40. The NH2 is a significant project that will run for 32 kilometres between the proposed Manuka Road Reservoir in Titirangi and the Albany Reservoirs. While the NH2 is currently forecast for completion in 2034, there are risks associated with its delivery timeline, and this could extend beyond 2035. That poses programme risk for the Orewa 3 Watermain which is dependent on the completion of NH2 first.

Private Servicing

41. Watercare fundamentally does not support the establishment of permanent long-term private water or wastewater treatment facilities for servicing of FUZ land. This is due to the lack of efficiency and long-term sustainability of private infrastructure including the different legislative obligations of private bodies corporate versus public bodies, the impact on funding of planned public infrastructure to support planned growth, and the risk of sub-standard process units being installed, incurring costs to homeowners or the public sector later if the infrastructure is proposed to be vested to Watercare (assuming Watercare were to decide to accept vesting of such infrastructure).
42. However, due to the complexity of connecting 1,213 individually owned dwellings to the public network some 25 years in the future, including the vesting of private assets that have been operational, managed and maintained outside of Watercare's control, future connections to the public networks may not be feasible and cannot be committed to now. Given this considerable uncertainty, it would be prudent for the Applicant to assume that private water and wastewater servicing will be required on an ongoing basis. That is, the interim solutions cannot rely on a future connection to the public networks and should be designed and consented to be able to continue for an indefinite period of time without needing to switch to public servicing.

Section 67 information gaps

43. As set out in Watercare's initial comments dated 24th March 2026, the Application does not consider how the proposed private WTP and WWTP will be decommissioned in the future and connected to the public system. More information, including appropriate conditions, is required to confirm that any water supply and/ or wastewater systems will be designed and constructed in accordance with Watercare's Code of Practice, and addressing the monitoring and reporting, decommissioning, and potential future connection to the public system.

Conclusion

44. Watercare has assessed the capacity of the existing and planned bulk infrastructure required to support the Delmore Project ahead of the 2050+ timing in the FDS and confirms that the earliest connections could be provided without limiting development of the existing live zoned areas and sequenced growth would be from 2038+ for water supply and 2050+ for wastewater servicing.
45. On this basis, even if the Application is granted, Watercare may refuse water and wastewater connections for the Delmore Project in accordance with its policies and under the Water Supply and Wastewater Bylaw 2015.

46. The Applicant is proposing for both water supply and wastewater, permanent private servicing, interim private servicing with connection to the public network in the future, or connection the public network immediately. There are challenges and significant risks associated with each of these options. Notwithstanding Watercare's position above, if the Panel is minded to grant the resource consent application, Watercare has a number of proposed amendments to the conditions (refer to the attachment).

47. Watercare is open to further discussions with the applicant.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'H S', followed by a stylized flourish.

Helen Shaw
Head of Strategy and Consenting
Watercare Services Limited

Address for Service:
Amber Taylor

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AMENDMENTS TO PROPOSED CONDITIONS