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15th May 2026.

Masato Nakamura
Consultant Planner, Colab Planning
[redacted]

Russell Butchers
Principal Project Lead, Auckland Council
[redacted]

Dear Masato/Russell,

Re: Fast Track Referral: 100 Halsey Street, Auckland Central - FTAA-2603-1190

Introduction

1. Watercare Services Limited (Watercare) welcomes the opportunity to provide comments on the Fast-track referral application (FTAA-2603-1190), made under section 13 of the Fast-track Approvals Act 2024 (Act).

2. Barker & Associates, on behalf of RP Financial (the 'Applicant') proposes a comprehensive redevelopment of 100 Halsey Street, Wynyard Quarter, Auckland CBD. The existing bus depot activities will be removed and replaced with a commercial-led mixed-use development comprising five new buildings (Buildings B1 to B5) arranged around a network of lanes and publicly-accessible spaces that improve mid-block permeability and connections within the Wynyard Precinct. The existing Travelodge building at the north-eastern corner of the block is proposed to remain and is outside the primary scope of the Project works, although it is within the legal boundaries of the Site. There is potential that additional plant may be required to be constructed on the Travelodge building, which will be confirmed in a future substantive application.

3. Site is located within the Business – City Centre zone under AUP and is located within sub-precinct B of the Wynyard Precinct.

4. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:

    - 100 Halsey Street Infrastructure Assessment, prepared by Tonkin & Taylor Ltd Date March 2026 Job Number 1101937 v1

    - 100 Halsey Street, Auckland Central Referral Application Planning Assessment, prepared by Barker & Associates dated 27 March 2026;

    - Fast Track Referral Application Revision H 26.03.2026, Prepared By Georgia Ganley, Emanuele Lisci, Cameron Pattullo, Manuel Diaz.

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

Watercare's purpose and statutory obligations

6. 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.

7. 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 Future Development Strategy (FDS).

8. 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 future urban areas, 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 CCOs which requires working with Council and other CCOs to achieve the outcomes and objectives set out in the Auckland Plan 2050.

Watercare's Comment

Bulk and local Wastewater

9. As per the reports reviewed, the site is serviced by existing public wastewater infrastructure, with connections discharging to the wider network associated with the Amey Daldy Park Pump Station (Wynyard Quarter Pump Station) and the Fanshawe Street Pump Station catchments.

10. Based on the 100 Halsey Street Infrastructure Assessment, the proposed wastewater discharge has been estimated as follows:
    - Average Dry Weather Flow (ADWF): 3.65 L/s
    - Peak Dry Weather Flow (PDWF): 7.30 L/s
    - Peak Wet Weather Flow (PWWF): 19.36 L/s

11. At a high level, existing public wastewater infrastructure may be able to service the proposed 12-storey residential development at 100 Halsey Street (48 units), subject to further detailed assessment.

12. It is noted that the Fanshawe Street Pump Station does not have available capacity to accommodate additional flows. Accordingly, the wastewater servicing strategy for this site will need to ensure that all proposed discharges are directed to the Wynyard Quarter Pump Station, with no increase in flows to the Fanshawe Street catchment.

13. Accordingly, the current assessment should not be relied upon as confirmation of wastewater servicing capacity. The assessment remains preliminary and subject to further detailed investigation.

Wastewater Infrastructure Information Required to Support Watercare's Assessment

14. Confirmation of proposed wastewater connection points, noting that there shall be no increase in flows to the Fanshawe Street catchment.

15. Hydraulic assessment confirming available downstream capacity, surcharge risk, wet weather performance, and impacts on the wider network.

Watercare Position – Wastewater

16. At this stage, Watercare does not identify any wastewater servicing matters that would preclude the proposal from proceeding through the Fast-track process in principle.

17. However, Watercare is unable to conclusively confirm available wastewater servicing capacity or infrastructure impacts until detailed design and supporting servicing assessments have been provided and reviewed.

Bulk and local Water Supply

18. As per the reports reviewed, the site is serviced by an established reticulated potable water network, including 150 mm, 200 mm, and 300 mm water mains located within Halsey Street, Gaunt Street, and Pakenham Street West.

19. The proposed development demand has been estimated as follows:

    - Average Daily Demand (ADD): 3.65 L/s;
    - Peak Daily Demand (PDD): 7.30 L/s; and
    - Peak Hour Demand (PHD): 18.26 L/s.

20. While the post-development water demand has been summarised in the report, potable water demand associated with the data centre and substation options has not been assessed at this stage and will require further evaluation in subsequent design stages.

21. At a desktop level, the surrounding water network appears likely to have sufficient capacity to accommodate the proposed development demand.

22. However, the assessment documentation does not confirm whether the existing network can achieve the required firefighting flows and residual pressures associated with the proposed sprinkler system and FW2 firefighting classification. No hydrant flow or pressure testing has been undertaken as part of the assessment.

23. Accordingly, firefighting compliance remains unverified; available residual pressure performance has not been confirmed; and final firefighting supply requirements remain unresolved.

24. Confirmation of the firefighting approach will require detailed assessment and coordination with Watercare during the detailed design stage.

25. At later stages of the project, opportunities to establish multiple connection points and/or customer meters from different parts of the network may be explored to better balance system demand.

26. Watercare acknowledges that, based on the information provided to date, the surrounding trunk water network may have sufficient bulk capacity to accommodate the proposed development demand.

27. However, key uncertainties remain, including unassessed demand components (such as the data centre and substation) and unresolved firefighting flow and residual pressure requirements.

Water Infrastructure Information Required to Support Watercare's Assessment

28. Hydrant flow and pressure testing;

29. Confirmation of firefighting supply strategy, specifically, sprinkler flow requirements;

30. Identification of any infrastructure upgrades required to service the development.

Watercare Position – Potable Water

31. Subject to the above, Watercare does not identify any potable water servicing matters that would, in principle, prevent the proposal from progressing.

32. All proposed connections and any required infrastructure upgrades will be subject to detailed design review and approval in accordance with Watercare Engineering Standards.

Conclusion

33. Based on the information provided and reviewed to date, Watercare acknowledges that, at a high level, the existing water supply and wastewater networks may have the potential to service the proposed development.

34. However, the current assessments remain preliminary and do not provide sufficient information to confirm servicing availability or network performance with certainty. In particular, key constraints and uncertainties remain in relation to wastewater servicing, including capacity limitations associated with the Fanshawe Street Pump Station and the condition and adequacy of existing local wastewater connections.

35. In relation to potable water supply, while the surrounding trunk network appears likely to have sufficient bulk capacity, critical information gaps remain. These include unassessed demand components (such as the data centre and substation), unresolved firefighting flow requirements, and the absence of confirmed hydraulic and pressure performance data.

36. Accordingly, both wastewater and potable water servicing will require further detailed design and supporting technical assessment.

37. Subject to the matters outlined above, Watercare does not identify any water or wastewater servicing matters that would, in principle, prevent the proposal from progressing at this stage.

38. All servicing arrangements, network connections, and any required infrastructure upgrades will remain subject to detailed design review and formal approval in accordance with Watercare Engineering Standards and applicable approval processes.

39. Watercare welcomes the opportunity to engage with the applicant and to review any proposed conditions at the substantive stage.

Yours faithfully,

[redacted]

Anna Jennings
Manager Major Developments
Watercare Services Limited

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