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Submission on the Proposed Regional Policy Statement for Northland

Proposed Regional Policy Statement for Northland
Northland Regional Council
Freepost 139690
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Attention: Evania Laybourn (Planning & Policy Admin)

On behalf of the New Zealand Geothermal Association

3 December 2012

The New Zealand Geothermal Association (NZGA) would like to make a submission on the Proposed Regional Policy Statement for Northland.

The NZGA is an independent, non-profit association that provides information on geothermal phenomena and utilisation for industry, government and educational organisations. In addition, the NZGA, as a member of the International Geothermal Association, contributes to the international exchange of information within the geothermal development industry. NZGA membership comprises participants, regulators, and interested parties within the geothermal community; NZGA has 343 members currently.

The particular parts of the Proposed Regional Policy Statement we support are:

1) Issue 2.4 Regional Form

NZGA supports the objective of planned growth that results in an urban form that is energy efficient and more sustainable than less consolidated development, resulting in efficient and well integrated urban infrastructure.

2) Objective 3.6 Enabling economic wellbeing

We support objective 3.6 which seeks to manage natural and physical resources sustainably while also supporting economic development for the benefit of Northland and its communities. Balance is central to this equation.

3) Objective 3.8 Promote regionally significant infrastructure

NZGA agrees that efficient and effective infrastructure is an essential component of self-sufficiency, stability and economic strength for the regional economy. We support the plan to recognise, integrate and maintain regionally significant infrastructure.

4) Section 3.10 Security of energy supply

NZGA supports the emphasis on use of renewable sources to ensure Northland's energy supplies are secure and reliable.

5) Policy 5.4.1 Renewable Energy

NZGA supports the emphasis on recognising Northland's renewable resources and seeks that this is expanded to more explicitly respond to the NPS for Renewable Electricity Generation along the following lines: "Recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits of renewable electricity generation activities by enabling the development of Northland's renewable energy resources.". We note the Government's target of 90% renewable electricity production by 2025, the National Policy Statement for Renewable Electricity Generation (NPS REG), (www.mfe.govt.nz/rma/central/nps/generation.html), gazetted on 14 April 2011, and section 79(j) of the RMA: which highlight the benefits of renewable energy. The proposed NPS will address the lack of recognition of the national significance of renewable electricity generation and how the benefits should be weighed against adverse environmental effects.

Reason for our support:

The RPS adequately identifies the importance of regional resources and their appropriate use for enhancing well-being while ensuring sustainable management.

The particular parts of the Proposed Regional Policy Statement we support in part and oppose in part are:

6) Issue 2.3: Explanation

Paragraph 2: We request the inclusion of a reference to geothermal energy and management practices in this paragraph; e.g. *The quality of our natural environment and resource management decisions (like choices about land use, management of existing and future infrastructure, and use of natural resources like wind, water, geothermal energy, and minerals, and the management practices employed influence the economic strength and prosperity of Northland and its contribution to the national economy.*

Paragraph 5: While not specific to geothermal we support the inclusion of fish farming and hydro-power in the not-land-based reference.

Paragraph 11: As a suggestion, after first sentence, insert 'In the last 15 years this situation has improved considerably with the geothermal generation from Ngawha'. The Ngawha power stations should be recognised as regionally significant infrastructure.

Some mention of existing electricity generation in the context of security of supply should also be included for completeness.

7) Issues 2.8 Natural character, features/landscapes and historic heritage

Explanation:

It is noted that the area where the Ngawha hot springs are located is documented in the maps (145). We request the inclusion of Lake Waiparaheka as an outstanding natural feature (ONF) for completeness and accuracy, as this is an important natural feature.

8) Objective 3.10 Security of energy supply

Explanation: Paragraph 2: Insert as underlined: *Diverse sources of energy generation in Northland will give the region security and provide economic, social and environmental benefits. The region also needs to reduce its reliance on fossil fuels by promoting renewable energy sources. Renewable energy generation is a national priority and the government has set a target to produce 90% of our electricity generation from renewable sources by 2025. Community and micro renewable energy generation can provide security and resilience as well as reducing pressure on the national and regional grid. Secondary heat use from geothermal resources is also a resource that can reduce demand on traditional electricity generation sources.*

9) Section 5; Regional form and infrastructure

5.3 Regionally significant infrastructure

5.3.5 Method – Monitoring and information gathering

- (a) *Maintain a record of regionally significant infrastructure and contact details (where publically available or permission obtained) and make it freely available; and*
- (b) *Identify and, where appropriate, map the location of regionally significant infrastructure.*

The two Ngawha geothermal power stations should be documented as regionally significant infrastructure and ensure that they are correctly represented on the maps as such.

5.4 Renewable energy

5.4.1 Explanation:

Paragraph 2: add; *Renewable energy is not limited to electrical production as it also includes other energy types such as direct heat application.*

The Ngawha geothermal resource and hot spring resources as identified in Mongillo and Clelland (1984) and Petty et. al. (1987) should be identified in this section.

10) Glossary:

Add definition for:

- (i) *Renewable energy*: *'Renewable energy means energy produced from solar, wind, hydro, geothermal, biomass, tidal, wave, and ocean current sources'¹.*
- (ii) *Renewable electricity generation*: *The generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.*
- (iii) *Renewable electricity generation activities*: *The construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed generation activities, the system of electricity conveyance required to convey electricity to the*

¹ RMA Section 2 definition

distribution network and/or the national grid, and electricity storage technologies associated with renewable electricity.”²

Indigenous ecosystems (that are threatened) add geothermal.

Add definition for geothermal water: Geothermal water is defined in the RMA as meaning water heated within the earth by natural phenomena to a temperature of 30 degrees Celsius or more; and includes all stream water, and water vapour and every mixture of all or any of them that has been heated by natural phenomena.

11) Appendix 3: Regionally significant infrastructure

(1) Add 'Ngawha power stations'.

Reasons for our partial support of these provisions:

The RPS does not give adequate consideration to the value of the Ngawha geothermal resource, its surface features, and the use of the resource for electricity production, tourism, cultural well-being, and other potential uses such as direct heat applications.

We trust that this submission is helpful.

I do not wish to appear in support of my submission.

I do not wish to present a joint case.

Yours faithfully



Brian White
Executive Officer
New Zealand Geothermal Association

² Reference NPS