

Ministry for the Environment
PO Box 10362
Wellington 6143
Attention: Draft National Planning Standards

NZ Geothermal Association Submission to Ministry for the Environment on Planning Standards

Thank you for the opportunity to make a submission on the Draft National Planning Standards. Please find attached New Zealand Geothermal Association's submission regarding this document.

Should you have any queries regarding the content of this document please contact Stephen Daysh directly on [REDACTED] or by email at [REDACTED]

Regards,



Stephen Daysh
President, New Zealand Geothermal Association

Background

The New Zealand Geothermal Association (NZGA) would like to thank the Ministry for the Environment for the opportunity to submit on the Draft National Policy Standard.

The New Zealand Geothermal Association (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. It totals almost 300 members currently.

The New Zealand Geothermal Association supports the intention of the standards which aim to make Resource Management Act (RMA) plans simpler to prepare, and easier for users to understand, compare and comply with. We look forward to release of the final standards and are available to provide input to any remaining issues and solutions to be explored.

This submission will be published on the NZGA website, and we have no objection to it being published in any other setting.

We wish to comment on one provision of the draft standard, as below:

Standard	Issue	Submission Point	Relief sought
S-RPS	Geothermal	<p>Page 9 of the standards states that “If water matters are addressed in the regional policy statement (RPS) they must be included in the water chapter. Local authorities must consider whether to combine this chapter with the land chapter.” A similar provision is provided for on page 13 for regional plans.</p> <p>Requiring geothermal water to be dealt with in the same chapter as fresh water cuts across the intent of the RMA that resource management issues specific to a region should be dealt with by that region. Geothermal water (and coastal water) are recognised by the RMA as having different management issues from fresh water and need to be treated differently.</p> <p>Because of the different issues that geothermal water and land uses face, and because of the integrated nature of the effects of use of geothermal water and land, the New Zealand Geothermal Association prefers the current structure that both Bay of Plenty and Waikato Regional Councils have in their policy and planning documents of dealing with these resource issues together in a separate chapter. Waikato and Bay of Plenty regions between them are responsible for sustainable management of 90 percent of the nation’s geothermal resource making this a unique regional issue.</p> <p>The issues regarding the management of geothermal water are different from those for freshwater and both councils have in their RPS and Regional Plans separate chapters for the management of this regional geothermal resource. These geothermal chapters contain specific objectives, policies, rules, other implementation methods and environmental results anticipated. This approach in the statutory documents recognises that the issues for geothermal management are related to, but not limited to water management. They also include sustainable management of heat and energy as a resource, which in some cases does not involve taking and discharge of water, and land management practices ensuring access to geothermal energy while protecting rare and highly vulnerable geothermal features and ecosystems.</p> <p>These resources also contribute substantially to the regional economy through industrial direct heat use, electricity generation and tourism, reinforcing the importance of a separate and focussed management approach in planning documents.</p>	Provide clarification in the standards that geothermal water can be considered separately as a special topic.

Yours faithfully



Stephen Daysh
NZGA President

