

7 July 2025

Hearings Panel
Proposed Far North District Plan
Far North District Council
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Tēnā koutou Commissioners,

Proposed Far North District Plan – Hearing 14 – Urban Zones - Ngāwhā Generation Limited Submitter Statement

Ngāwhā Generation Limited (**NGL**) is a subsidiary of Top Energy Limited (**Top Energy**). NGL acknowledges that Top Energy has made a separate submission on the PDP that requests a variety of relief. NGL supports that submission and supports the relief sought by Top Energy.

NGL administers and operates the Ngāwhā Geothermal Power Station at Ngāwhā Springs. A pilot plant with 2 x 5 Megawatts (**MW**) stations was originally commissioned in 1998 at Ngāwhā Springs, based on Ormat binary technology. In 2008, due to the success of the pilot, NGL expanded with the largest unit available at that time, a further 15MW. Following a number of years of feasibility studies, business cases and resource consent applications, a further 32MW expansion was approved and commissioned in 2020, resulting in a current total output of 57MW of generation.

This submitter statement addresses the implications of the PDP for NGL, focused specifically on definitions and the Light Industrial Zone provisions for the Ngāwhā power station.

NGL supports the Reporting Officer's following recommendations contained in "Section 42A Report – Urban Zones":

- To accept NGL's submission point in relation to Rule LIZ-R1.¹ The Reporting Officer has recommended deleting the 450m² Gross Floor Area (**GFA**) limit from this rule for the reasons outlined in the submissions, particularly that other standards within the Light Industrial Zone already manage location, bulk, and scale of buildings and structures. This satisfies the relief sought by NGL regarding their concerns around GFA limit being too restricting when industrial activities within a light industrial area typically require large buildings.
- To accept in part NGL's submission point in relation to Rule LIZ-R5.² The Reporting Officer agrees that it may be appropriate to increase the permitted GFA for convenience stores, restaurants, cafes and takeaway food outlets. However, the Reporting Officer does not consider it appropriate to remove the

¹ S432.008

² S434.013

GFA limit entirely as the Light Industrial Zone is not intended to be the primary location for such commercial activities. The Reporting Officer’s recommendation to increase the GFA limit for these activities to 300m² satisfies the relief sought by NGL as they consider this limit sufficient for these types of activities.

- To accept NGL’s submission point in relation to a new rule permitting appropriate industrial activities and light industrial activities in the Light Industrial Zone.³ The Reporting Officer recommends a new permitted activity rule for light industrial activities (LIZ-RX). The Reporting Officer also recommended a new discretionary activity rule for other industrial activities (LIZ-RY). This satisfies the relief sought by NGL seeking new rules of light industrial activities and other industrial activities.
- To accept in part NGL’s submission point in relation to LIZ-R7 to amend the activity status for commercial activities to permitted.⁴ The Reporting Officer has recommended that commercial activities within the Waipapa Control Area in the Light Industrial Zone are permitted. While the Reporting Officer still recommends that commercial activities in all other areas of the Light Industrial Zone are a discretionary activity, NGL are supportive of this recommendation.
- To accept NGL’s submission point in relation to LIZ-R16 to amend the activity status for community corrections activities to permitted.⁵ The Reporting Officer has recommended that this activity be reclassified to a permitted activity, subject to a maximum of 12 people on site at any one time. This satisfies the relief sought by NGL to permit community corrections activities.
- To accept in part NGL’s submission point in relation to LIZ-R18 to amend the activity status or primary production activities to permitted.⁶ The Reporting Officer has recommended that this rule be amended to only refer to ‘farming’ activities as they do not consider that all primary production activities should be permitted (i.e. mining). This satisfies the relief sought by NGL to utilise any vacant land within the Light Industrial Zone for grazing without requiring a resource consent to do so.

Although NGL are generally supportive of the new definition for ‘Light Industrial activities’ recommended by the Reporting Officer, they continue to seek for that definition to specifically reference the *“construction operation and maintenance of structures associated with renewable electricity generation.”*⁷ As recommended by the Reporting Officer, the definition does not specifically reference this type of activity. This is important to NGL because of the existing and planned operations on its landholdings at Ngāwhā. As notified, the PDP Renewable Electricity Generation Chapter does not specifically enable community scale renewable electricity generation activities and large-scale renewable electricity generation activities as a permitted activity within the Light Industrial Zone. Top Energy presented evidence at Hearing 11 seeking that this be amended, but the response from the s42A Reporting Officer for the Renewable Energy topic has been to reject that request. As such, NGL are of the view that these activities should be specifically provided for within the definition of “light industrial activities” as sought in the original submission.

Related to the amendments sought above to the definition for ‘light industrial activities’, NGL also sought amendments to the objectives and policies of the Light Industrial Zone to specifically recognise and provide

³ S432.014
⁴ S432.015
⁵ S432.026
⁶ S432.027
⁷ S432.003

for the “construction operation and maintenance of structures associated with renewable electricity generation.”⁸ This is important, because NGL considers that the Light Industrial Zone is a suitable zone for renewable electricity generation, as is evident in its existing and possible future operations at its Ngāwhā landholdings. Noting the s42A Reporting Officer for the Renewable Energy Chapter’s negative recommendation for Top Energy’s submission points in the Light Industrial Zone, NGL consider it is necessary to include specific direction and recognition for renewable electricity generation within the LIZ provisions.

I can confirm that NGL will not be filing evidence for Hearing 14 at this stage and does not wish to be heard at the hearing. However, I am available to answer any questions from the Hearing Panel either in writing or via videoconference if required.

Yours sincerely | Nāku noa, nā

Barker & Associates Limited



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⁸ S432.006, S432.007, S432.030, S432.031, S432.032, S432.033, S432.034, S432.035, S432.036, S432.037 & S432.038