Response ID ANON-URZ4-5FSG-A

Submitted to Fast-track approval applications
Submitted on 2024-05-02 17:42:20

Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name:
New Zealand Energy Limited

2 Contact person

Contact person name:
David Inch

3 What is your job title

Job title:
Managing Director

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

PO Box 113
Motueka 7143
Nelson

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

Middle Road
Raetihi
Central North Island

Legal description: Pt Section 9, Lot 3 DP 8697, Blk II and Lots 1 & 2 DP 8697, Lots 1 & 2 DP 10354, Blk III, Makotuku SD.

Adjacent to the Raetihi hydro power station storage lake and canal system

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Do you have a current copy of the relevant Record(s) of Title?

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

New Zealand Energy limited

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

NZ Energy has the legal interest in the land where the proposed pumped hydro, solar pv arrays and community scale wind generators are proposed. The applicant is therefore able to undertake the work required for the project.

Section 2: Project details

What is the project name?

Please write your answer here:
Raetihi Renewable Energy Project

What is the project summary?

Please write your answer here:

The Raetihi Renewable Energy Project proposal is to initially build a grid scale solar farm next to NZ Energy's existing hydro generation scheme. A following stage would be installing wind turbines on NZ Energy owned land followed by investigating extending the hydro generation storage pond and installing a pumped hydro plant.

What are the project details?

Please write your answer here:

The existing Raetihi hydro power station is regionally significant supplying electricity to the Raetihi and Ohakune townships for over 106 years. The region's natural and renewable resources could be further utilised to improve the security of electricity supply and resilience for these communities.
The initial stage of this project is to construct a 1MW solar farm adjacent to the hydro storage pond. This will improve security of supply and resilience for the local community as the existing head pond storage will be used to store water while the sun shines and then electricity will be generated using the hydro plant outside of those hours.
A further stage would be to extend the solar farm to 5MW.
The site has good potential for community scale wind generation on NZ Energy owned land (the next stage in the project). This can be located adjacent to NZ Energy's water canal system. It is estimated a further 5MW of wind generation could be located within the canal corridor.
NZ Energy would also investigate a pumped hydro plant, (where water is pumped back into the storage pond when electricity prices are low). This part of the proposal is at a high level concept stage. Depending on what is developed, the budget would be between s 9(2)(b)(ii) for up to 10 GWh annual electricity volumes.
We intend to work with MBIE on this as it looks like a good opportunity to partner with the community for renewable community electricity generation - improving resilience, reliability and lowering the cost of electricity.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

NZ Energy could commence construction of the Solar Farm immediately upon fast-track approval starting with procurement of equipment and its estimated the Solar Farm could be commissioned within 6 months of approval.
As demand for electricity increases in the region, NZ Energy is committed to constructing further solar and the wind farm (as per the Project outline above) so that this region is supplied by a very high, if not 100%, renewable generation.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act resource consent
Wildlife Act - both during the consent application assessment process and once consent is granted

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Horizon Regional Council
Ruapehu District Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

None, however, the existing scheme has resource consents expiring in 2037 so we are seeking to have all consents, current and future aligned for a common renewal date at least 35years from approval for this Project.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

Some stages of the project may require agreement with neighbouring landowners.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Design of the 1MW Solar Farm is reasonably generic and would be completed within 4 weeks of receiving approval.
Funding will be provided by the company's banking facility, and this will be finalised during the detail design stage.
Procurement would occur immediately upon acceptance of the detailed design.
Delivery is typically up to 3 months and site works will begin immediately equipment arrives on site.
Completion and Commissioning is expected to take just 3 months for this Stage 1 project.
The further stages will follow on from the completion of Stage 1 but detailed planning and design will also begin immediately upon fast-track approval.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The project works will be entirely on private land and will incorporate the existing power scheme that has been in the community for 106yrs.
To the best of our knowledge there are no treaty settlements, protected customary rights, etc over the land.
The local authorities are the Horizon Regional Council and the Ruapehu District Council.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

This project is an enhancement/upgrade of an existing consented power scheme which is located on private land with other private landowners neighbouring the entire scheme.
Limited consultation has been had with one immediate neighbour and they are very supportive of what is being proposed. Further consultation will be had with other immediate neighbours.
As this power scheme is developed further it lends itself to becoming a community power scheme and so consultation with the wider community, which has a high Māori population (70%), will also be undertaken.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

not applicable.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

None

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:
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Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

The solar panels are on private land away from any public roads. They will not be viewed by anyone other than neighbouring properties. There are now well-established assessments on the visual impact of solar panels. The effects will be less than minor.
The pumped hydro will incorporate the existing infrastructure and so no new effects are envisaged with this activity.
The staged community scale wind turbines will also have a visual and noise effect that is also now well understood and the appropriate measures to mitigate those effects will be adopted.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The National Policy Statement for Renewable Electricity Generation (NPS-REG) is highly relevant to this Project. The contribution of renewable electricity generation, regardless of scale, towards addressing
the effects of climate change plays a vital role in the wellbeing of New Zealand, its people and
the environment. This Raetihi Renewable Energy Project is consistent with:

Policy A: noting the national, regional and local benefits including increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions; increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation; using renewable natural resources rather than finite resources; the reversibility of the adverse effects on the environment of some renewable electricity generation technologies; and avoiding reliance on imported fuels for the purposes of generating electricity.
Policy C1: as the Project will be co-located with existing structures and infrastructure including the distribution network and the national grid in relation to the renewable electricity generation activity, and the need to connect renewable electricity generation activity to the national grid.
And Policy E1, E2 and E3.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Note, the process to reconsent the existing hydro power station took 19 years. This is despite the fact the hydro power station had been part of the local environment and operating within consent conditions for over 100 years.
Consenting for the new solar, pumped hydro and wind turbines plus reconsenting the exiting hydro to align with the new consents would take, in our experience, many many years and would become prohibitively expensive.
Because this development is a renewable energy project that requires numerous forms of renewable energy generation, all of which need approval so that the project can proceed it is essential that they are approved under one singular approval process.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

This Project is not complicated to approve - construction is to occur on private land owned by the developer who has demonstrated a commitment to maximise the use of natural renewable resources to achieve a reliable and resilient supply of electricity to the regional community and economy.

Has the project been identified as a priority project in a:

Other

Please explain your answer here:

None of the above but it does achieve government and sector planning for renewable energy generation and transmission and distribution constraints.

Will the project deliver regionally or nationally significant infrastructure?

Regional significant infrastructure

Please explain your answer here:

The entire Project will deliver ~10GWh of electricity each year - the annual usage of electricity of 1,420 average households (7,033kWh av. consumption in March 2023 year; 2.7 people per household). That is, the Project will supply electricity to all the households in Raetihi and Ohakune plus another 450 households in the surrounding area.
This is also significant in that the community will eventually be 100% supplied by its own renewable energy supply.

Will the project:

Please explain your answer here:

Electricity is essential to a well-functioning society - both urban and rural environments.
It is a forgotten essential service when it comes to district planning for new housing developments.
No consideration is given to where is the energy going to come from to supply the new housing developments that have been approved. So, where land is being made available for new housing, equally renewable energy projects need to be incrementally approved to supply the power to these houses.
Additionally, now with the push for EV's, the same consideration needs to be given to "where is the power going to come from to charge the EVs".

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The economic benefits will be significant for the region during construction - employing up to 20 staff at the peak of the construction.
The staged project would be in the order of 3-5 years and this will also provide a good steady stimulus for the district.

This Project is also expected to result in a lower cost of electricity for the region - providing economic stimulus to business and improving the cost of living for households.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

This Project is embedded in the local rural economy and will support primary industries. This includes dairying and vegetable processing facilities. As technologies develop this will lead to carbon reduction on farm through the future development of green hydrogen that will be produced at the source by this renewable electricity project.

Will the project support development of natural resources, including minerals and petroleum?

Yes

Please explain your answer here:

This project supports the use of natural resources that are continuously replenished (renewable) with minimal impact on the environment. It will have in the future the capacity to produce green hydrogen and methanol from the renewable electricity it produces.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The project will have a significant impact on climate change mitigation. The total output of 10GWh per annum of renewable electricity will displace approximately 2,000T/yr (MfE) greenhouse gas emissions from burning fossil fuels to generate electricity. This will typically come from reducing the need to run utility-scale fossil-fueled generation plant in the North Island.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The Project improves resilience for the surrounding community – on a daily basis and during recovery from natural hazards. The completed upgraded scheme will have the generation capacity and will be designed to run islanded so that it can be generating when the area is disconnected from the national transmission and distribution networks.

Will the project address significant environmental issues?

No

Please explain your answer here:

No but the Project is also not expected to create significant environmental issues.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The local and regional planning documents are silent on renewable generation.
District Plans have not yet caught up with the need for renewable generation as outlined in the NPS -REG.

Anything else?

Please write your answer here:

The Raetihi Power scheme has existed in the community and the environment for 106yrs.
This Project with make use of existing infrastructure and at the same time achieve national objectives of increasing renewable generation and reducing carbon emissions.
It provides significant regional benefits through security of supply, increased renewable generation, lower cost electricity and economic benefits through the construction stage of the project.
It will also provide an opportunity to develop a fully 100% renewable community energy scheme.
It is very important to note that infrastructure passes the test of time and Raetihi is a living example of that, and the enhanced power scheme will have the ability to do that for many more hundreds of years.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

NZ Energy has over the years received minor enforcement notices from the Horizon Regional Council for non-compliance with consent conditions. These are generally minor in nature, many of which are administrative like reporting requirements.
NZ Energy would be happy to provide any further details should they be required.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:
David Graeme Inch

Important notes