

To: Listed Projects Team – Ministry for the Environment  
From: Rebecca Sanders/Nick Roberts – Barker & Associates Limited  
Date: 31 March 2026  
Re: Planning Memorandum for Waiheke Onsen clarifying Geothermal

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We refer to the request for further clarification from the Ministry for the Environment on an application for referral under the Fast Track Approval Act 2024 for the Waiheke Onsen project, dated 31 March 2026. Further clarification has been requested regarding the potential for extracted groundwater for the Onsen being classified as “geothermal”.

The Resource Management Act defines geothermal water as being 30 ° C or more<sup>1</sup>. A preliminary temperature survey has been undertaken of the bore water from the site. Some temperatures from the survey were above 20 ° C however, the preliminary testing did not show that the water met the 30° C threshold to be classified as Geothermal. The results of this survey are appended to the Groundwater Memo (Attachment 9 of the Application).

While the current testing does not indicate that the groundwater will meet the temperature threshold to be classified as geothermal, there is a desire from the applicant to undertake deeper drilling as part of the further investigations to support a substantive application. Preliminary advice from the project hydrologist is that deeper drilling could result in warmer water with the potential to reach the 30° C threshold to be considered geothermal. It is the project hydrologist’s view, that if this is the case it will likely be a result of the normal rock temperature increasing with depth, rather than evidence of a specific geothermal system.

Given the potential for the more detailed testing to result in groundwater that meets the temperature threshold to be classified as Geothermal, we have identified that the project may potentially trigger the following reason for consent:

- The take and use of geothermal water for bathing use not otherwise provided for is a **discretionary activity** pursuant to E7.4.1(A24).

We trust that this further information addresses the further clarification request. Please do not hesitate to contact us should additional clarification be required.

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<sup>1</sup>Resource Management Act 1991 Section 2(1)