

13 October 2020

Bay of Plenty Regional Council
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Attention Regional Policy Statement team

Tēnā koe

Draft Change 5 (Kaituna River) to the Bay of Plenty Regional Policy Statement

1. Eastland Generation Limited (**Eastland**) welcomes the opportunity to provide comments on *Draft Change 5: Kaituna River (C5)* to the Bay of Plenty Regional Policy Statement. This letter comments on C5 as it relates to Eastland's specific interests.

Eastland Generation Limited

2. Eastland is a renewable electricity generator. Eastland is a partner in the Te Ahi o Maui Geothermal Power Station in Kawerau, with Kawerau A&D Ahu Whenua Trust. Geothermal Developments Limited, Eastland's wholly owned subsidiary company, also currently carries out geothermal energy generation in Kawerau, as well as generating hydro and diesel electricity elsewhere in New Zealand.
3. Eastland is a partner with Taheke 8C and Incorporated Land Blocks Incorporation in the development of a 25MWe geothermal power station, at the location known as the Taheke geothermal field near Okere Falls.
4. The proprietors of Taheke 8C and Adjoining Blocks hold a water take consent (consent number 68062) for water from the Kaituna River (**the River**) for the take and the surface water intake structure. The purpose of the consent is for exploratory geothermal bore drilling and eventual power generation purposes.
5. Eastland recognises the importance of restoring, protecting and enhancing the River and supporting its sustainable management.

Comments on C5

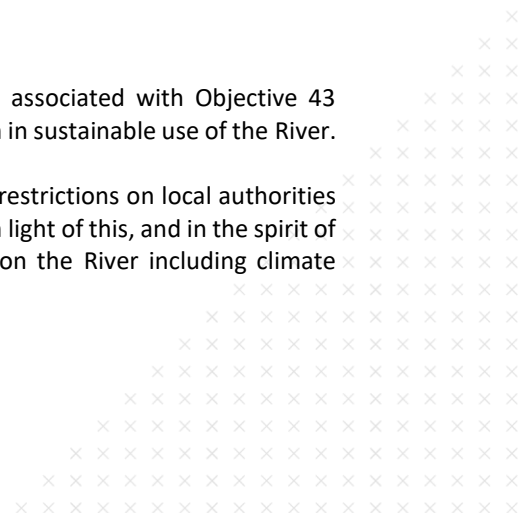
6. Eastland supports the objectives, policies and methods in C5 which relate to the promotion of economic development and employment opportunities for tangata whenua (Objective 46, Policy KR 7B, Method KR6). Eastland considers that this reflects the purpose of the Kaituna River Document, and provides for the important relationship of tangata whenua with the River. Eastland is confident that the Taheke geothermal development will support and contribute to this objective.
7. Eastland considers that the method regarding promotion of employment opportunities at the River could be expanded to encompass all projects in or around the River, rather than land management projects only (Method KR6). This will encourage other opportunities for tangata whenua. A renewable energy generation development is a good example of this, providing

tangata whenua with employment opportunities resulting from sustainable use of the River's resources.

8. Eastland's view is that the health of the River, and the cultural and recreational relationship people have with it, need to be integrated with the current and future economic development opportunities on the River and their associated benefits for tangata whenua and the region. Certain provisions in C5 have potentially significant implications for economic development in the vicinity of the Kaituna River.
9. For that reason, specific reference should be included, regarding the need to integrate economic development opportunities, with the following provisions:
 - (a) development of water quality limits including sustainable flow and catchment load limits (Method 23I);
 - (b) the requirement for water quality to be safe for bathing, drinking, kai awa and kai moana sources and cultural ceremonies in some areas (Policy KR 2B);
 - (c) protection of the Kaituna River's indigenous aquatic, riparian and wetland vegetation habitats (Policy KR 6B);
 - (d) increased public and cultural access to the River (Method KR3, 23T);
 - (e) formal identification and establishment of tauranga waka (Policy KR 1B).
10. Eastland considers that where areas are to be classified for drinking water, bathing areas, kai awa, kai moana and suitable for cultural ceremonies (Policy KR 2B), these areas should be comprehensively consulted on and clearly identified. There are other activities which currently occur on the River that necessitate access or structures in their current locations. Where activities are currently occurring at fixed locations, this should be considered when classifying these areas.
11. Eastland proposes that Method 23S, requiring removal or adaption of structures impeding cultural and recreational access in the River, should include the words 'where appropriate' as is included in the explanation below the proposed method. This would acknowledge that it will not always be possible or necessary for structures in the River to be removed or adapted. Further, it would acknowledge that cultural and recreational access needs to be integrated with the importance of some structures in current activities occurring at the River.
12. Eastland considers that the boundaries of the co-governance area at Map 4ab need to be more clearly identified. The effect, if any, that C5 will have on the areas of the River that are outside of it given the 'whole of catchment' approach promoted by C5 also needs to be clarified.

Climate Change Mitigation

13. Eastland's view is that there should be a specific policy in C5 associated with Objective 43 regarding the recognition of the role of climate change mitigation in sustainable use of the River.
14. The Resource Management Amendment Act 2020 has removed restrictions on local authorities considering climate change mitigation in their decision making. In light of this, and in the spirit of the Kaituna River Document which responds to the pressures on the River including climate



change, Eastland considers that it is appropriate for there to be a climate change mitigation policy in C5.

- 15. Activities being, or to be, carried out on or around the River should be considered in light of the effect they will have on climate change mitigation. It is important that weight is given to activities resulting in reduced CO₂ emissions, given such activities will become increasingly important as the Government works towards carbon neutrality by 2050.
- 16. Eastland thanks Bay of Plenty Regional Council for the opportunity to provide comments on C5 at this time. We look forward to reviewing the formally notified version of Draft Change 5.

Ngā mihi
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