

29 July 2021

The Chief Executive
Bay of Plenty Regional Council
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BY EMAIL
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Attention Regional Policy Statement team

Tēnā koe

Submission on Proposed Change 5 (Kaituna River)

1. This is a submission on Proposed Change 5 (Kaituna River) to the Bay of Plenty Regional Policy Statement made on behalf of Eastland Generation Limited (**Eastland**).
2. Eastland cannot gain an advantage in trade competition through this submission.
3. The details of Eastland's submission are set out below.
4. Eastland does wish to be heard in support of its submission.

Eastland Generation Limited

5. 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.
6. 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.
7. 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.
8. Eastland recognises the importance of restoring, protecting and enhancing the River and supporting its sustainable management.
9. Eastland provided comments on Draft Change 5, which it submitted to the Bay of Plenty Regional Council on 13 October 2020.

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Submission on C5

10. The specific provisions that Eastland’s submission relates to are:

- (a) Objective 45;
- (b) Policy KR 6B;
- (c) Policy KR 7B;
- (d) Method KR3;
- (e) Method KR6;
- (f) Method 23S; and
- (g) A proposed new policy in relation to climate change.

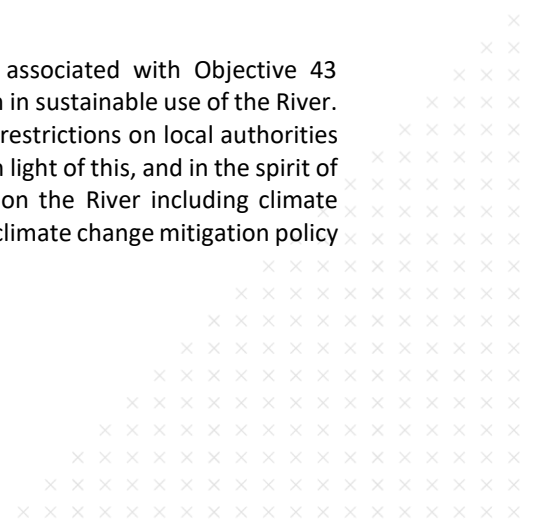
11. Eastland’s submission is in support of the objectives, policies and methods in C5 which relate to the promotion of economic development and employment opportunities for tangata whenua (Objective 46, Policy KR 7B, Method KR6). Eastland considers that this reflects the purpose of the Kaituna River 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.

12. Eastland opposes the inclusion of reference to the River in Method 23S and seeks that reference to it is removed. It is submitted that this policy does not need to and therefore should not apply to the River, due to the lack of structures on the River, which is what the method is aimed at addressing in the context of the Rangitaiki River, where there are three hydro electricity generation schemes.

13. If reference to the River is to remain in Method 23S, Eastland submits that the words ‘where appropriate’ should precede ‘Kaituna River’ in the method itself. This would acknowledge that cultural and recreational access needs to be integrated with the importance of some structures in current activities occurring at the River.

14. Eastland considers that additionally commentary needs to be included in Method KR 3 which requires areas to be classified for drinking water, bathing areas, kai awa, kai moana and suitable for cultural ceremonies. Eastland submits that such areas should be widely consulted on and clearly identified, and that this should be specified in the explanation text to the policy. 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.

15. Eastland submits that an additional policy is required in C5 associated with Objective 43 regarding the recognition of the role of climate change mitigation in sustainable use of the River. 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.



- 16. 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.

Ngā mihi
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