

19 April 2023

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By email

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## TAHEKE GEOTHERMAL PROJECT

### Background

1. The Ministry for the Environment ("**MfE**") invited Rotorua Regional Airport ("**Airport**") on 7 March 2023 to comment on the application for referral for the Taheke Geothermal Project ("**Project**") under the COVID-19 Recovery (Fast-track Consenting) Act 2020.
2. The Airport provided its initial submission on 14 March 2023. In that submission, the Airport advised it had commissioned a report from NIWA to understand the extent of any effects of the Project on the Airport ("**NIWA Report**") and sought an extension to the submission deadline to allow that report to be completed. The NIWA Report was provided to MfE on 28 March 2023.

### Significant concerns

3. As set out in the Airport's submission, the Airport does not oppose the Project in principle. The Airport's concern is to ensure there are no effects on the safety of Airport operations. There are obvious significant consequences, including risk to life, if these effects occur. The NIWA Report outlines that it is likely that Civil Aviation notification thresholds may be exceeded as a result of the Project.
4. It is critical that the modelling and data used to assess the potential plumes from, and associated geothermal activity of, the Project are robustly tested and considered. The Airport is concerned that there has been an insufficient assessment (even at the level of detail needed for a referral application) of the potential effects.
5. A comprehensive and reputable aeronautical study must be undertaken to ensure there is sufficient certainty as to any potential effects and their implications, given the very significant risks. This is particularly the case as the Airport understands the Applicant has not yet confirmed which type of facility it wishes to take forward. This is a real concern. The NIWA Report recommends that a more detailed justification including a written report by the developers and its consultants as to the visible plume modelling from cooling towers and well-testing be undertaken.
6. The Airport considers that the standard Resource Management Act 1991 processes (which allow the time for the necessary technical assessment to be undertaken and for expert evidence to be tested in a hearing process) are more appropriate for this particular Project. For example, the aeronautical study referred to above would generally need to be

undertaken by expert consultants with input from the Airport, airlines such as Air New Zealand and the CAA as regulator. This would generally involve several rounds of consultation with the relevant parties, and is necessary to ensure that the study has been sufficiently inputted into and the findings are robust.

## Other interested parties

7. The safety concerns outlined in the Airport's submission do not just impact the Airport, but users of the Airport as well as the regulator who is responsible for civil aviation safety.
8. In the event that the Minister does accept this Project for referral, the Airport seeks that Air New Zealand, the Civil Aviation Authority and Airways also be identified in the referral Order in Council as parties that must be invited for comment on the application (in addition to the Airport). It is essential that any expert consenting panel appointed to consider the substantive application is able to hear from these parties as to any impacts of the Project on their operations and effects on aviation safety.
9. In order to ensure these parties are fully informed, the Airport would like to share its submission and the NIWA Report with them. Please urgently let us know if MfE has any concerns about this.
10. The Airport would be happy to discuss its submission with MfE and provide any other information that may assist.

Yours faithfully



**Jayne Marsh**

SMS and Aeronautical Manager

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