

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Bay of Plenty Regional Council
Contact person (if follow-up is required)	Ella Tennent, Consents Manager
	s 9(2)(a)
	Ph 0800 884 880

Comment form

Please use the table below to comment on the application.

Project name	Taheke Geothermal Project
General comment – potential benefits	We acknowledge the benefit of renewable energy sources for the nation and the financial benefits of the proposal to the beneficiaries of Taheke 8C and the wider community.
General comment – significant issues	This geothermal resource is not well understood, and accordingly significant information is required in order to sufficiently assess the effects of the proposal.
Is Fast-track appropriate?	<p>Whilst Fast-track could be appropriate, we are concerned that the very technical nature of the information required necessitates in-depth technical reviews by experts which requires sufficient timeframes. There are relatively few geothermal experts within New Zealand and therefore the timeframes of the Fast-track process may mean that the sustainable use of the resource is unable to be assessed to the extent that it warrants. Unsustainable use of the resource could potentially lead to a loss of geothermal surface features and a reduction in the geothermal resource. Accordingly, we do not support the Fast-track process for this project unless either:</p> <ul style="list-style-type: none"> the Ministry or panel commissions these technical reviews and any issues are resolved (with the processing time suspended), or the reviews are completed and any issues resolved prior to the consent application being lodged.
Environmental compliance history	There were no compliance issues with the test bore that was drilled on the site under consent RM20-0847. There were low scale compliance issues on the Eastlands Te Ahi o Māui geothermal power station project in Kawerau during the construction and establishment phase. An abatement notice was issued for that consent relating to breaches of the maximum daily abstraction volume and provision of information required by consent conditions. Those issues have been resolved.

<p>Reports and assessments normally required</p>	<p>Reports and assessments we would normally expect to be provided with this type of application include:</p> <ul style="list-style-type: none"> - Assessment of effects on cultural values - Assessment of effects on geothermal surface features - Assessment of effects on the sustainable use of the geothermal resource, including geothermal reservoir modelling, analysis of geochemistry and geophysics - Assessment of effects on air quality - Assessment of effects relating to the recent changes to the RMA regarding greenhouse gas emissions - Archaeological assessment (there are recorded archaeological sites within proximity of the site) - Assessment of effects on other geothermal users such as Tikitere Holdings (Hell's Gate) - Assessment of effects from the proposed freshwater take, including the sustainability of the proposed take / allocation status, cultural effects, assessment of whether the proposed take is an efficient use, effects on other consented water users, ecological effects and effects from the intake structure (if the intake structure is not permitted under the Regional Natural Resources Plan) - Assessment of effects of earthworks and associated discharge of sediment-contaminated stormwater including erosion and sediment control plans, dust management plan, cultural effects and geotechnical stability - Identification of relevant rules from regional plans and National Environmental Standards. - Assessment of the proposal against relevant policy of the Regional Natural Resources Plan, the Regional Policy Statement and national direction such as the National Policy Statement for Freshwater Management and the National Policy Statement for Renewable Electricity Generation.
<p>Iwi and iwi authorities</p>	<p>The site is within the co-governance area of Te Maru o Kaituna River Authority.</p> <p>Within proximity of the site is the Rotorua Te Arawa Lakes Strategy Group area.</p> <p>There is a Statutory Acknowledgment to the Affiliate Te Arawa Iwi and Hapū over the Rotorua Geothermal System.</p> <p>The site is within the rohe of Ngāti Pikiao and Ngāti Māhino.</p> <p>Further to this, Ngati Rangiteaorere have a resource consent application lodged with Bay of Plenty Regional Council (and on hold) for exploration works (consent application 68151) which is a precursor to consent applications for a geothermal power station in Tikitere. The Ngāti Rangiteaorere Claims Settlement Act 2014 provides a statutory acknowledgement over the Tikitere geothermal field within the Rotorua geothermal system.</p> <p>Tikitere Geothermal Power Ltd has a resource consent application lodged with Bay of Plenty Regional Council (and on hold) for the development of a geothermal power station (consent application 68161).</p> <p>The Tikitere Geothermal Power Ltd application is on Māori-owned land –</p>

	Paehinahina Mourea 1 and Tikitere A (aggregated) Ahu Whenua Trusts. Both applications were lodged in 2015.
Relationship agreements under the RMA	There are no active Mana Whakahono-a-rohe agreements or formal Joint Management Agreements with the regional council within the area.
Insert responses to other specific requests in the Minister's letter (if applicable)	Not applicable
Other considerations	

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Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

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Organisation providing comment	Rotorua Regional Airport
Contact person (if follow-up is required)	Jayne Marsh
	s 9(2)(a)
	s 9(2)(a)

Comment form

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Project name	Taheke Geothermal Project
General comment	In principle we support the project, and it's great to see some significant industry establishing in Rotorua. However, we believe that any potential effects on aviation are not yet sufficiently understood and therefore at this stage we have unresolved concerns that cannot be addressed in the allotted timeframe. Accordingly, we request an extension to the submission deadline in order to provide a better assessment of possible impacts to aviation.
Other considerations	<p>Rotorua Airport has engaged a consultant from NIWA to assist with understanding the extent of any effects on aviation. This includes firstly an assessment of vertical air currents generated by the plant and whether this will breach the requirements for efflux discharge in the Civil Aviation Rules including in relation to our Obstacle Limitation Surface. Secondly NIWA will assess what effects water vapour may have on visibility and weather conditions. Rotorua Airport is already disproportionately affected by fog and low cloud because we have a high instrument flight approach minima (decision height for pilots to continue with an approach to land) due to geographical constraints, and we would like some assurance that water vapour from the plant will not make this worse.</p> <p>NIWA are under way with this assessment which we expect to receive at the end of March 2023. We request an extension to the submission deadline in order to provide a better assessment of possible impacts to aviation.</p> <p>One further consideration is whether substances in any discharge is harmful in a more concentrated form, for example if an aircraft were to fly directly through a discharge cloud without the mitigating effect of dispersion. Does this cause any harm to the people in the aircraft, and is there a corrosion risk to the aircraft itself? Due to the location directly under our flight path this situation is likely to occur.</p> <p>We are concerned that Air NZ have not been consulted to date, given the possible effect on their operations. As a major provider of Air Transport services into Rotorua carrying 265,000 passengers in FY19 they also need the opportunity to provide feedback. It is also prudent to seek feedback from other airspace users and the current timeline does not allow for this.</p> <p>It is likely that the two types of proposed plant designs could have greater/lesser effect on aviation due to their inherent nature. We request that aviation effects including those mentioned above be factored into the decision.</p>

[Insert specific requests for comment]	As above regarding our Obstacle Limitation Surface and the Civil Aviation Rules regarding efflux discharge. There is not currently sufficient information available to us to be able to assess this properly.
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Local authority providing comment	Rotorua Lakes Council
Contact person (if follow-up is required)	Jean-Paul Gaston (DCE - District Development, Chief Executive's Group)
	s 9(2)(a)

Comment form

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Project name	Taheke Geothermal Power Station
General comment – potential benefits	<ul style="list-style-type: none"> - Creation of construction jobs (short term) - Long term operational job creation - Creation of Sustainable Energy (commitment to mitigate climate change) - Supports Taheke 8C to fulfil their development aspirations for their land
General comment – significant issues	<ul style="list-style-type: none"> - Potential Landscape and Visual Effects on surrounding area
Is Fast-track appropriate?	<ul style="list-style-type: none"> - Yes - Strategically Aligned - Plan enabled (i.e Taheke Development Area)
Environmental compliance history	<ul style="list-style-type: none"> - No
Reports and assessments normally required	<ul style="list-style-type: none"> - Landscape and Visual - Cultural Impact Assessment - Transportation Assessment - Standard Infrastructure Reports - Acoustic Assessment
Iwi and iwi authorities	<ul style="list-style-type: none"> - Ngati Makino - Ngati Pikiao
Relationship agreements under the RMA	<ul style="list-style-type: none"> - Statutory Acknowledgment over Taheke, Tikitere Geothermal field

Insert responses to other specific requests in the Minister's letter (if applicable)	
Other considerations	N/A

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Invitation to comment on applications for referral under the Covid-19 (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Transpower New Zealand Limited
Contact person (if follow-up is required)	Jo Mooar
	Senior Corporate Counsel
	s 9(2)(a)

Comment form

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Project name	Taheke Geothermal Project
General comment	<p>Transpower has been identified as an “other person” for the purpose of section 21(3) of the COVID-19 Recovery (Fast-Track Consenting) Act 2020 (Act). Thank you for the opportunity to provide comments about the Project, and its potential impact on National Grid assets.</p> <p>Transpower supports the application as it “<i>contribut[es] to New Zealand’s efforts to mitigate climate change and transition more quickly to a low emissions economy (in terms of reducing New Zealand’s net emissions of greenhouse gases)</i>” (section 19(d)(vii) of the Act).</p> <p>Transpower is not aware of any reason for the application to be declined. However, some potential impacts on the Grid will need to be managed in order to connect to the Grid.</p> <p>The 220kV Edgecumbe-Taraukenga A line (220kV line) and the 110kV Okere-Te Matai A line traverse the development area. These assets could not be compromised by the development and would need to be protected.</p> <p>The applicant proposes:</p> <ul style="list-style-type: none"> to connect the generation to the Grid at the 220kV line; a switchyard would be established in close proximity to the 220kV line; and a new transmission line from the switchyard through the development area to the proposed power plant.

	<p>Transpower has had very preliminary discussions with the applicant, and an investigation into the connection has not commenced. Transpower operates a Queue Management Framework, for managing investigations into generation connection. The Project is not yet in the queue. As a result, we are uncertain of the extent on any works on existing Grid assets or to establish future Grid assets.</p> <p>Despite these issues, provided appropriate management occurs, including time to commence and complete any necessary investigations in accordance with our Queue Management Framework, the Project would not be inconsistent with Policy 10 (in particular) of the National Policy Statement on Electricity Transmission (section 23(5)(c) of the Act).</p> <p>We do not consider these issues are a reason to decline the application for the Project to be referred to an expert panel.</p>
Other considerations	See above.
[Insert specific requests for comment]	Transpower would appreciate the opportunity to comment on any conditions to be imposed during the consenting phase, to ensure the Grid is not adversely impacted.

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Organisation providing comment	Waka Kotahi New Zealand Transport Agency
Contact person (if follow-up is required)	Sonya McCall, Team Lead Poutiaki Taiao / Environmental Planning environmentalplanning@nzta.govt.nz

Comment form

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Project name	Taheke Geothermal Project, Rotorua
General comment	<p>Waka Kotahi does not object to the fast-track process being utilised in this instance. However, Waka Kotahi is a key affected party and wishes to provide input into the fast-track consenting process should the project be referred. An overview of technical considerations that Waka Kotahi will need to provide commentary on are summarised below.</p> <p>Waka Kotahi does not oppose the project in principle, provided that appropriate mitigations are implemented.</p> <p>From the Waka Kotahi perspective, there are no significant transport matters that the Minister should be aware of when deciding whether the project should be referred to an expert consenting panel.</p> <p>Waka Kotahi has not identified any matters that would prevent the proposal from meeting the criteria for referral under the Act, specifically sections 18, 19, and 23.</p> <p><u>Technical Considerations</u></p> <ul style="list-style-type: none">• Sight distances are approximately 230m-240m in both directions from the proposed SH33 access, which is considered to be adequate.• The State Highway access point can be upgraded to a standard that adequately addresses safety and operational effects.• Given high construction-related trip generation, a Temporary Traffic Management Plan will likely be required. Subject to this, construction traffic can be suitably managed. Provision will need to be made for haulage of oversize structures.• There has only been one crash near the site in the last five years. This crash occurred about 200m south of the site, and was a loss of control in dark, wet conditions.• Close consultation and coordination will be required with Waka Kotahi regarding the proposed pipeline beneath State Highway 33. Subject to this, Waka Kotahi does not have any in principle concerns regarding this aspect of the proposal.

	<ul style="list-style-type: none"> At the consent stage, consideration will need to be given to how the Rotorua to Tauranga Cycle Touring/Backpacker Route along this section of SH33 will be accommodated.
Other considerations	N/A
[Insert specific requests for comment]	N/A

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