

# **Council of Outdoor Recreation Associations of New Zealand Inc**

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23 April 2008  
To: Buller District Council  
[julies@bdc.govt.nz](mailto:julies@bdc.govt.nz)

## **SUBMISSION ON A RESOURCE CONSENT APPLICATION SECTIONS 93(2) & 96 OF THE RESOURCE MANAGEMENT ACT 1991**

To: Buller District Council                      Copy to:        Meridian Energy Limited  
C/- West Coast Regional Council              PO Box 2454  
PO Box 66    Christchurch  
Greymouth

**APPLICANT: MERIDIAN ENERGY LTD**

**Closing date for submissions is Wednesday, 23 April 2008**

### **Submitter Details**

Name: COUNCIL OF OUTDOOR RECREATION ASSOCIATIONS OF NEW ZEALAND  
INCORPORATED (CORANZ)

*(full name)*

Address: P O Box 1876, Wellington

*(full postal address)*

Correspondence to be sent to the following name and address: *(if different to above)*

C/o Hugh Barr, 12 Versailles St., Karori, Wellington 6012

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We **oppose all** the application numbers of this Application

Our submission is that: The Council (CORANZ) opposes the Consent in its entirety

*(state in summary the nature of your submission. Clearly indicate whether you support or oppose*

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*the specific proposal, or wish to have amendments made, giving reasons)*

This submission is made on behalf of the Council of Outdoor Recreation Associations of New Zealand - CORANZ. The Council is the national association of seven major national outdoor recreation associations – New Zealand Federation of Freshwater Anglers, New Zealand Deerstalkers Association, New Zealand Four Wheel Drive Association, Option4 – Recreational sea fishers' Trust, Public Access New Zealand, New Zealand Bowhunters Society, New Zealand Salmon Anglers Association; and the regional Marlborough Recreational Fishers Association. Our members seek discussion and common ground on outdoor recreation issues.

CORANZ member associations have approximately 18,000 members in total, and represent one of the larger membership alliances in New Zealand.

CORANZ is interested in protecting public back-country wild land areas and parks in a natural state, for outdoor recreation purposes.

This proposed Dam, if built will destroy a large area of public conservation land, at present being designated as the Kawatiri Conservation Park.

### **1 Specially protected areas - Conservation Parks:**

Conservation parks are specially protected areas under the Conservation Act (S's 18 and 19, Conservation Act). Specially protected areas provide additional specific protection or preservation requirements. The **purpose of conservation parks**, as well as protecting natural and historic resources, is to facilitate public recreation.

Consequently this proposal will be on public conservation land that is (or soon will be) specially protected as a Conservation Park.

### **2 Major adverse Impacts on recreation and amenity values of the Proposal:**

The proposed dam will destroy 14 km of the lower Mokihinui River, and replace it with a narrow winding lake, submerging and destroying 337 Ha of native forest and river ecosystem, and the recreational value of this section of the un-dammed wild and scenic river. It will also destroy river angling for trout in this part of the river.

### **3 Major adverse impact on public recreational access to the Valley:**

The Applicant intends to close off the Valley's only direct means of public walking and vehicular access to the Mokihinui Valley above the proposed dam, should he gain this consent, for at least the construction period. This is the 29 Ha of public road) the Applicant intends to drown in the proposed lake, and the remainder of it that will become disconnected from it. This is of major concern to our members.

The present track on the true left, and vehicular access to it, is by far the most straightforward public access to the Valley. CORANZ strongly opposes this proposed closure of public access, and consequently any closure by decision, or by flooding, of the public road. At the evry least, an alternative public road should be agreed, to replace it.

### **4 Major adverse Impacts on the ecology:**

The lake will drown 14 km of the endangered blue duck's river habitat. Besides being endangered, blue ducks are greatly appreciated by recreational users. It will also compromise eel habitat in the river by cutting off this migratory species from the sea, so eliminating them in the long term from this river system. And it will destroy the land's carbon storage capability.

### **5 Concern about Kyoto Carbon Credits and sustainability:**

The land which the proposed dam will flood will be primarily responsible for creating the carbon credits that will come from this land, is a bonus to the electricity generated. It is our contention that these credits should reside with the public land, given it is this land and the lake that Meridian may be allowed to build, rests on this land.

CORANZ seeks the following decision from the Local Authority:

*(give precise details)*

Should the Dam be agreed to, then CORANZ asks the Local Authorities involved (Buller District Council and West Coast Regional Council) to require Meridian to:

**1) provide secure long term public foot and vehicular access through the site**, from the Mokihinui Road to the Valley track on the true left, above the dam construction site, **throughout the 3 year or longer construction period and beyond, because Meridian intends taking the public road up the valley.**

**Reason:** A public road already runs through the proposed dam site and up the Valley. The road will be flooded by the proposed dam, so removing the public's access right to pass and re-pass on this land. Meridian should be required to buy and provide an alternative direct strip of land to replace that public road, should this proposal be approved.

In any case, the three or more years Meridian proposes closing the access for during construction, and probably beyond, is a permanent, not a temporary closure. It would lock the public out of the area for at least this time, and is an unacceptable interference with public recreation on public conservation land, Crown riverbed and a public road.

**2) replace the track down the true left of the lower Mokihinui River**, from the Forks to Mokihinui Road below the Dam, as part of the mitigation process.

**Reason:** Meridian is destroying this track and public access with its dam, and stands to gain very significant financial profits from this scheme, if the dam goes ahead. Some of this money should be used to replace public access being destroyed with a new public access way, with equivalent public access rights to the public road it is destroying – see 1) above.

**3) plant 337 ha to sequester carbon to replace the 337 Ha of native forest carbon the Applicant will destroy in the long term with their proposed hydro lake.** This should at least be a deficit from any carbon credits they get to sell from the scheme.

**Reason:** This is the area of native forest being destroyed by the Applicant's dam. They should make carbon restitution for this.

**4) to ensure the carbon credits arising from the scheme to go to the Department of Conservation, to be used to fund recreational and ecological enhancement of the Public Conservation Estate.**

**Reason:** The Applicant's proposal will damage public conservation land and destroy its present recreational and ecological values. The sustainable gain from this is two-fold, first electricity generation. Second the sustainable value of the carbon saved in generation from a hydro source. It is only fair that these carbon credits be used to offset the recreational and environmental cost of the proposal. The Applicant will make significant profits from this venture, including Kyoto compliant carbon credits, primarily from the Public Conservation Land. These credits should lie with the owner of the land, the public of New Zealand, or with the land's administrator on their behalf, DOC..

**5) to provide public use of the boat ramp being built at the proposed Dam, at no cost to the public.**

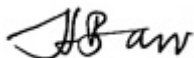
**Reason:** Partial mitigation of some of the damage done to recreational users, and destruction of the present means of public access, by the proposed dam. Motor boats can access the valley via the river at present. But Meridian's dam will stop that if it is built. To avoid, remedy or mitigate this destruction of public access to rivers and their margins (S6 (a) RMA) the Applicant should be required to mitigate this damage at least to the extent of supplying alternative access to the river/lake by motor vehicles or on foot eg kayaks, from the proposed dam.

**Conclusion:** Given Meridian intends to place its private commercial enterprise on public parkland, with significant loss of recreational values, then mitigation measures are due to the public, and to the manager of that land on behalf of the public.

Use the tick boxes to indicate the resource consent application(s) your submission concerns.

Write a clear tick in the appropriate box(es).

I/we make my/our submission concerning **all** the consent applications listed below  Yes  
I/we **wish to be heard** in support of my/our submission.  Yes



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*(signature(s) of person making submission) (Date)*

**HUGH BARR**

Secretary, Council of Outdoor Recreation Associations of New Zealand Inc

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*(If this is a joint submission by 2 or more individuals, each individual's signature is required)*

I/we **have** served a copy of my/our submission on Meridian Energy Ltd as per Section 96(4) of the RMA  Yes

**Consent list:**

- RC07/180-A Land use activities associated with Dam, Staging Area & Associated Infrastructure
- RC07/180-B Land use activities associated with the Inundation Area
- RC07/180-C Land use activities associated with the Walking track
- RC07/180-D Land use activities associated with the Dam Access Road & Power Supply
- RC07/180-E Land use activities associated with Transmission Poles/Lines, Substation & Access Tracks
- RC07/180-F Land use activities associated with the Boat ramp/jetty
- RC07/180-G Land use activities associated with the Log Boom
- RC07/180-H Land use activities associated with the Use and Storage of Hazardous Substances