

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

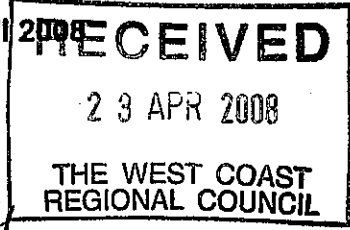


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C/- West Coast Regional Council
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APPLICANT: MERIDIAN ENERGY LTD

Closing date for submissions is Wednesday, 23 April 2008



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I/we ~~support~~ the application numbers ticketed on the back of this form
I/we **oppose** the application numbers ticketed on the back of this form

(tick one)

My/our submission is that: See attached
(state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific proposal, or wish to have amendments made, giving reasons)

Submission from Hamish Macbeth to

Buller District Council and West Coast Regional Council
regarding

Meridian Energy Limited's resource consent applications for the
Mokihinui Hydro Proposal

Introduction

This is a personal submission from Hamish Macbeth. I live in Karamea and have an interest in coastal land on the Karamea Bluffs, namely at Falls Creek. I have been a Buller District Councillor for twelve years and a resource consent commissioner for most of that time, until standing down in October 2007. I am also currently a member of the West Coast Conservation Board, which I have chaired for about three years, until recently standing down from that position. This submission is my own personal submission.

General

My submission asks that both councils decline these applications for all resource consents. I believe the proposal is so significantly detrimental to this environment that there is no ability to avoid, remediate or mitigate against the scale of these effects. To decline any one of these consents would effectively disallow the project to proceed. Rather than identifying each consent which has the potential to have unavoidable detrimental effects, it is easier to consider them as a collective.

The issues of loss of conservation values and loss of natural character refer generally rather than specifically.

I oppose the applications on all considerations. I wish to speak at a hearing in regard to my submission. I request that the hearing be held locally, at least no further afield than Westport. My written submission refers in particular to certain aspects, but I wish to preserve the right to speak on all aspects of the application. Further information may become available, and other submissions and staff reports may identify other areas about which I would like to comment. Furthermore, the applicant has produced an application which is detailed and technical in parts, extending to at least 1700 pages.

Consultation

Meridian has been conscientious in consulting with various communities. The West Coast Conservation Board has been addressed on at least two occasions, and the local communities have had many opportunities to find out information. There are some areas about lack of information which cause me concern however, and they relate to 'adaptive' management plans and where further studies are required before detailed planning is made (eg in regard to seismicity). If the commissioners allow the proposal to proceed in this manner, then the public becomes excluded from the decision-making in regard to those findings.

Assessment of Alternatives

I am not opposed to hydro electric power generation. I believe that small scale dams might on occasion be acceptable, and run-of-river schemes might be acceptable. I believe there are opportunities in the Karamea area (which I know best) and other West Coast areas where local, small scale hydro generation could be feasible and environmentally acceptable.

I am aware of at least two other schemes currently planned but not consented for in Northern Buller. One hopes to generate 4.5 MW and the other up to 30 MW. On the face of the evidence to date, it is my opinion that the environmental effects of these two schemes would be much more acceptable to the local communities. A recent community study of Karamea residents found that a local hydro scheme was favoured by many, although identification of a site was not asked for or detailed in most responses. The community attitude was that local generation for local needs is a desirable goal.

Solar water heating is a viable alternative for West Coast houses and small businesses. We have converted our house (on the main grid) about two years ago. Using a combination of solar power and wet back heating, we rarely use electricity to top up our hot water cylinder. I dispute the Meridian figures for converting West Coast houses to solar water heating. Even so, it is hard to equate the financial gains over the long term of more solar heated water compared with permanent heating by electricity. I haven't seen an analysis of the economics of that.

Meridian is a State Owned Enterprise and therefore has a responsibility not only to return a dividend to its shareholder, the government, but also to be heading down a socially and environmentally positive track. To save 5 to 10% of the West Coast's power needs with solar water heating (according to the Meridian application) is noteworthy and should be pursued. Additionally, if the money spent on this dam proposal went to solar water heating of the Nelson region as well, then the demand for this power to be reticulated to the Nelson region would be much diminished. Has an economic model been made of the effect of \$530 million being spent on solar water heating for the West Coast and the Nelson regions? If a more generous subsidy arrangement than the current government scheme which amounts to about \$500 out of a \$5000 investment, then the uptake could be considerable, with a public and private benefit.

While these considerations may be outside the scope of a resource consent, Meridian has made comment on these alternatives and discounted them. I do not agree with their conclusions.

Meridian confines its activities to what I would call major projects. This proposal is major. When asked about a more modest proposal, the Conservation Board was told that Meridian doesn't do small projects. It is my belief that Meridian is not interested in a smaller scale for this proposal, and that this proposal is so major that any minor modification of it would still define it as major. Meridian would have to present an entirely different application to enable the councils to consider the effects as acceptable.

Benefits to the local community

To show that there will be a long term benefit to the local community if this proposal were to proceed, I believe Meridian should offer a per unit levy to the local community. The West Coast has traditionally been used for extractive industries. Apart from employment at the time of construction, and occasionally some useful infrastructure left behind, there can be a feeling of the Coast being abused for outside financial gain.

Meridian has been non-specific about the financial benefits which would accrue to the West Coast apart from the construction phase of the project and possibly six long term jobs. If Meridian promised to allocate a very small percentage of its energy revenue to the West Coast, then Coasters could see a long term financial benefit accruing to them. Rather than identify an advantageous price to West Coast users of power, which seems very fraught to me, a mechanism based on a levy per unit of power produced would be much more readily transparent and

accountable. This revenue could then be directed on an annual basis to a development or environmental fund or both, dedicated to benefiting the West Coast. Such bodies exist currently with Development West Coast, and the West Coast Conservancy of the Department of Conservation.

If the West Coast is to lose this river gorge system, then Coasters need to be recompensed on an ongoing basis for this loss. Development West Coast was established as a consequence of the West Coast losing access to its native timber. A substantial sum of money should be envisaged, although how compensation is determined for the loss of a river system is impossible, or subjective at best.

If Meridian is serious about this proposal, and mitigating for this loss, then it needs to offer some form of recompense of a lasting and visible nature. It would be appropriate for Meridian to offer this as a condition.

Construction, safety and natural hazards

I have concerns about the immense nature of the construction works required, noise, machinery, impact on Seddonville residents etc. I have not seen reports of the integrity of the cofferdams and safety issues relating to workers and Seddonville and Mokihinui residents in the event of these failing. How will these dams cope in a significant earthquake or slip? Can the applicant or the councils satisfactorily guarantee the integrity of the final dam? What would be a suitable bond to cover all eventualities in the event of a major collapse? What bond would be considered appropriate in the event of a catastrophic collapse of the dam either during construction or after commissioning? A quantum would have to be appropriate for compensation of human lives, livelihoods and environmental damage and reparation.

Closure

I have not seen any documentation relating to closure of the hydro scheme. How would the applicant or the councils deal with a situation whereby the dam should no longer continue to be constructed, or should be decommissioned upon commencement of generation? (For example an unknown fault line was discovered, or an earthquake of such magnitude resulted in the applicant or the councils deciding to discontinue the project). At what point would the hydro scheme become ineffective or no longer viable with the silting up of the reservoir? Once the reservoir is fully silted up, what is the intention of the applicant in respect to retaining the dam or decommissioning the dam?

I also have concerns about the integrity of such a large and high dam in such a fragile environment. This gorge and its environment are determined by its geology, and faults and slips are part of its composition. The application notes that there is more detailed work to be done. The public will be excluded from participating in the decisions relating to the findings of this work. Even if a community consultation group is established, it is not clear how decisions reached will be able to be contested by the larger community.

Erosion

I am concerned about the largely unknown effects of this proposal on the coastline immediately surrounding the river mouth, and also north of this point. Coastlines exist in a state of dynamic equilibrium. The West Coast has the largest rate of littoral drift in New Zealand. Sediments are moved from southwest to northeast by the sub Antarctic currents and the East Australian current. Farewell Spit is the final 'sink' area and deposition landform, and is testament to the large amount

of sediment moved by the longshore drift along the South Island's West Coast from source areas such as the rivers and headlands.

The rate of longshore drift fuels wave energy and velocity, and the headlands and rocky coasts are areas of concentrated wave energy as a result. Groynes work more satisfactorily as sediment traps when wave energy is somewhat protected by limited fetch. On our coastline the unlimited fetch and extreme wave energy in times of storm episodes combined with longshore drift, would more than likely incapacitate groynes within a short time. Beaches are built up through processes such as hydraulic action by wave energy on headlands, and corrosion and attrition of eroded and fluvially provided sediments. The equilibrium is always in fine balance.

The Mokihinui adds its share of sediment to the total quantity of northeastwards-moving sediment. To take this river's sediment load out of the 'dynamic equilibrium' equation would skew the equilibrium in favour of accelerated rates of erosion. Not only would the shore around the river mouth be affected, so too would the areas to the north - the unprotected coastal strip between Little Wanganui and the Karamea being most vulnerable.

How confident is Meridian that it can mitigate or remediate for the potential loss of coastline at the township of Mokihinui? The beach at Falls Creek is being eroded at about one metre a year currently. What are the predictions for increased erosion without the Mokihinui River sediment?

It simply seems wrong to have such vast amounts of sediment not being able to follow their natural course to the coast. A natural event such as the slip at Makarora is something which humans come to terms with. Nature will no doubt reduce the dam at Makarora over time, and the sediment will find its way out to sea. This is not proposed in this instance.

Recreation

Meridian has offered some alternative uses for this site once the reservoir is filled. It is commendable that such initiatives are offered. I note that the historic route through to Karamea via the Rough and Tumble valley is not proposed in mitigation. I believe it should be added to the proposed mitigation.

However it should be noted that the Department of Conservation, the West Coast Conservation Board, and local users have also expressed interest in upgrading the Mokihinui track through to the Lyell prior to any knowledge of the Meridian proposal.

The present track is a sensational and challenging walk, providing a real sense of achievement and triumph upon reaching the Forks. The suggested alternatives will provide added opportunities, but at a cost of the feeling of challenge and wilderness which currently exists.

The only boating acceptable to many of the current users, in the event that a reservoir is allowed, would be non-mechanical. To replace the present soundscape of a rushing and boulder-crashing gorge with a silent reservoir would be disastrous; to replace with motorised boats and jet skis would altogether transform the area. This would represent a complete, absolute and unacceptable change of character.

Natural character

The character of this environment is well described, I believe, as 'rough and tumble'. This is the name of a jumbled tributary which enters the Mokihinui and which will be partly inundated if these consents are granted. The Rough and Tumble formerly provided access to Karamea, and

has recently been appropriated as the name for the lodge just below the proposed dam site. 'Rough and Tumble' perfectly reflects the present nature of this complete gorge section of the Mokihinui River. If the dam is built, a more appropriate descriptor might well be 'Quiet and Gentle'.

The Meridian contention that this is an isolated valley system and therefore few people will notice that it has been inundated, is flawed in my view. It is precisely because it is isolated and unmodified that it has its current aesthetic (and conservation) values. This is the very reason why many people (including myself) have chosen to live on the Coast. We value this pristine environment and have moved here because of it. We tramp, hunt and fish here for these very reasons.

How can the councils put a value on those attributes and somehow remediate or mitigate the effects of loss of character? It is the ruggedness, isolation and untamed qualities which characterise this valley system. In the short space of a few kilometres, the river descends from the hills to the sea. This is the character of many of our West Coast valley systems. These systems, singly and cumulatively, are the essential raw quality and a fundamental geographical feature of the West Coast.

Our human history is also defined by these rivers. Mokihinui means 'big raft'. Our cemeteries are generously represented by the 'New Zealand death' – death by drowning. These same rivers have brought down pounamu and gold which brought humans to this wild environment in the first instance. Our rivers have provided the sediment to produce the river valley plains on which our dairy farming industry is based.

And now the applicant wants to dam this river. To me this is emasculating this river. It will become a tame, known quantity, rather than having its wild and unpredictable quality. For six days out of seven, as I drive over the Mokihinui Bridge, I will observe a river flow rising and falling twice daily at the whim of an electricity generator, maximising its revenue collection according to peak demands.

Outstanding Natural Features and Landscapes

The applicant states 'The Buller District Plan does not consider the Mokihinui Gorge to be an outstanding natural feature or landscape (ONFL).' In my view this is incorrect. The Plan states: 'In consultation with the community, (the council will) develop an inventory of outstanding landscapes and natural features in the District by December 2002.'

The process of identifying ONFLs for the Buller District Plan has commenced, but has not been completed. The Council stated it would develop this inventory 'in consultation with the community ... by December 2002.'

The Buller District Council began a Plan Change in November 2003 and 113 changes were publicly notified on 23 June 2004. One of these changes was Plan Change 9 which was to identify and develop an inventory of outstanding landscapes and natural features. The Council identified some landscapes and features which it put out for consultation. These areas and others were then submitted on, both for and against, at which point other sites were proposed, including the Mokihinui Gorge. The Council has never reached a decision on the outcome of the hearings which followed. These were held in July 2005.

I believe that it is inappropriate for the Buller District Council to determine the suitability of the Mokihinui Gorge as a site for a hydro reservoir, given that this site is still part of a 'live' debate about its value as an outstanding natural feature or landscape. It is also inappropriate, I believe, to consider this river valley out of context, and in isolation from, the rest of Buller's rivers and other spectacular and outstanding natural features and landscapes.

Conservation values

I have a range of concerns relating to the conservation and environmental effects of this proposal on flora and fauna in the river system and coastal environment. I believe that not enough is known about the whitebait species which exist in this river and their breeding cycles, and how the fishery might be affected. I am uncertain about the effects on the habitat downstream of the dam when the river flow rises and falls twice daily like an ocean tide (but isn't). I am also uncertain about how the loss of sediment downstream may affect the river ecosystem.

I consider that the loss of this river gorge vegetation is excessive and the consequent drowning of the vegetation and gradual decomposition results in negative and excessive effects on water quality. The anoxic state of the reservoir appears to be poorly understood and quantified as to the effects on life above the dam and below.

I am not a scientist, but I expect there will be detailed analysis and other expressions of doubt about the sustainability of the conservation values lost by the development of this proposal.

Conclusion

I am not a Coaster by birth. I am a Coaster by choice. I have lived here since 1985 and taken a very active part in West Coast affairs at a community, district and regional level. I appreciate the natural and social make up of this environment. The values of this river are absolutely characteristic of the West Coast. Collectively these rivers combine to become an essential part of the fabric of the Coast. Energy is a crucial part of New Zealand's economy. The government has directed that energy comes from sustainable sources. I agree with this. Hydro electricity has potential in some circumstances to be sustainable. In this instance, a river is proposed to be transformed into a reservoir. This is not the character of the West Coast which I would choose.