



Department of Conservation
Te Papa Atawhai

fax

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Date: 23 April 2008

No. of Pages: 6
(including cover sheet)

Statement of Confidentiality

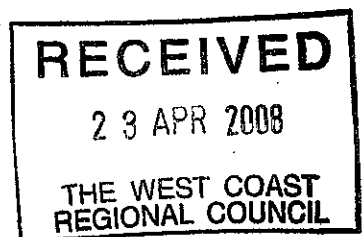
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Re: Mokihinui Hydro Proposal (RC07150)

Please find attached a copy of a submission from the Director General of Conservation on the above application.

A hard copy of this submission is in the post.

Kind regards,
Lisa Brock



RESOURCE MANAGEMENT ACT (1991)

To: West Coast Regional Council and Buller District Council

Submission on: Land use consents, water permits and discharge permits for the construction and operation of a hydro-electric power scheme on the Mokihinui River and associated transmission lines.

Applicant: Meridian Energy Limited

Submitter: Alastair Morrison, Director General of Conservation

Address: c/- Private Bag 701
Hokitika

Statement of Submission by the Director General of Conservation

Pursuant to Section 96(1) of the Resource Management Act 1991, I, Chris Hickford, Community Relations Manager, West Coast Conservancy of the Department of Conservation, on behalf of the Director General of Conservation, make the following submission on the above application for land use consents, water permits and discharge permits for the construction and operation of a hydro-electric power scheme on the Mokihinui River and associated transmission lines ("the Application").

My submission is that:

- 1 The Application fails to promote the sustainable management of the natural and physical resources of the environment as required by Part II of the RMA. The Application is contrary to sections 5, 6(a), 6(b), 6(c), 6(d), 6(f), 7(b), 7(c), 7(d), 7(f), 7(g) and 7(h) of the RMA.
- 2 The Mokihinui River gorge (which term includes the proposed construction and inundation areas) is a highly unmodified river gorge system of regional and national importance. The transmission line route traverses areas containing nationally important biodiversity values and high scenic values. The Application:
 - 2.1 Fails to sustain the potential of the natural and physical resources of the gorge and transmission line route to meet the reasonably foreseeable needs of future generations;
 - 2.2 Fails to safeguard the life-supporting capacity of the gorge and transmission line route; and
 - 2.3 Fails to adequately avoid, remedy or mitigate the adverse effects of the proposal on aspects of the entire Mokihinui River catchment, and in particular, the gorge and transmission line route.

3 The Application will exacerbate hazards, in particular coastal erosion, in the coastal environment in the vicinity of the Mokihinui River mouth, and will not promote sustainable management within this environment.

4 The Application fails to recognise and provide for matters of national importance contained in section 6 of the RMA in the following ways:

4.1 The Application is inconsistent with preservation and protection of the very high natural character of the Mokihinui River gorge, its tributaries, and their margins, and the Mokihinui River downstream of the proposed dam. The Mokihinui River catchment has very high natural values, being largely unmodified, and contains a variety of indigenous forest types. The proposed hydro scheme will require the removal of relatively large areas of vegetation. The proposed dam would inundate relatively large areas of intact indigenous forest, and the proposed flow regime will result in significant and prominent adverse effects on the natural character of the river, its margins, and the surrounding area; and

4.2 The Application is inconsistent with the preservation and protection of the natural character of the coastal environment, as the proposed dam will intercept the sediment supplied to the coastal environment by the Mokihinui River, thereby disrupting the natural coastal processes; and the altered flow regime will alter natural tidal hydraulics at the river mouth; and

4.3 The Application is inconsistent with the protection of outstanding natural features and landscapes;

4.4 The Application is inconsistent with the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna. The Mokihinui River catchment, and the proposed transmission line route are significant habitat for numerous indigenous bird species, some of which are considered to be threatened in accordance with the NZ Threat Classification System (Hitchmough et al., 2002), including black shag, bush falcon, blue duck, great spotted kiwi, kakariki, kea, kereru, South Island fernbird, South Island kaka, South Island rifleman, western weka, and long-tailed bat. The proposed dam and associated transmission lines bisect an area of very high large land-snail diversity; the area contains 6 threatened taxa of giant land snails. The river contains numerous indigenous fish species, some of which are considered to be threatened including, giant kokopu, longfin eel, lamprey, and shortjaw kokopu.

Both the construction and operation of the proposed hydro scheme and transmission line will result in considerable disturbances to these species through construction activities, altered and highly variable flow regimes, loss of connectivity within the catchment, and the permanent loss of habitat.

The construction and inundation areas within the Mokihinui River gorge include significant indigenous forest vegetation, and the transmission line route includes a range of significant indigenous

vegetation sequences. Construction and operation of the proposed hydro scheme and transmission line will result in considerable disturbance or permanent loss of this significant indigenous vegetation; and

- 4.5 The Application is inconsistent with the maintenance and enhancement of public access to and along the Mokihinui River gorge. Both the construction and operation of the proposed hydro-electric power scheme will have a significant impact on public access to and along the Mokihinui River, including recreational opportunities in and adjacent to the river; and
 - 4.6 The Application is inconsistent with the protection of historic heritage. The Mokihinui River catchment contains numerous historic heritage sites. The proposed scheme will result in the loss or damage to some of those historic heritage sites.
- 5 The proposed hydro scheme and transmission line would not be in accordance with other relevant matters, to which particular regard must be had under section 7 of the RMA, in the following ways:
- 5.1 The development of a hydro scheme on the Mokihinui River and associated transmission lines is not considered to be an efficient use and development of natural and physical resources; and
 - 5.2 The hydro proposal and transmission line will result in significant adverse effects on amenity values in the area, both during construction and in the long term as a result of the structures and associated activities. The 85-metre high and 300-metre wide dam and associated structures (including transmission lines) will be inconsistent with the remote natural scenic values of the gorge area and transmission line route; and
 - 5.3 The proposed scheme and transmission line will compromise the intrinsic values of the ecosystems at the sites where they will be located, and both upstream and downstream of the proposed dam; and
 - 5.4 The proposed scheme and transmission lines will not maintain or enhance the quality of the environment at the sites where they will be located or where they will cause downstream adverse effects; and
 - 5.5 The proposed hydro scheme would result in the loss of finite natural and physical resources, namely a highly natural wild and scenic river gorge ecosystem; and
 - 5.6 The Mokihinui River is a significant trout fishery on the West Coast, and the proposed hydro scheme will adversely affect parts of this habitat; and
- 6 The Mokihinui Hydro Proposal is not in accordance with all of the relevant policies and/or objectives of the New Zealand Coastal Policy Statement (1994), the National Policy Statement on Electricity Transmission (2008), the New Zealand Biodiversity

Strategy (2000); the New Zealand Energy Efficiency and Conservation Strategy (2007), the West Coast Regional Policy Statement (2000), and the relevant regional and district plans.

- 7 For the aforementioned reasons, I oppose the application in its entirety and seek that it be declined.
- 8 The Director General does wish to be heard in support of this submission.
- 9 A copy of the instrument of delegation is available at the West Coast Conservancy Office in Hokitika.
- 10 A copy of this submission has been served on the applicant.

Dated at Hokitika the 23RD day of APRIL 2008.



Chris Hickford
Community Relations Officer
West Coast Conservancy

Acting pursuant to delegated authority

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