



FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)  
P.O. Box 1604, Wellington.

RECEIVED  
24 APR 2008  
THE WEST COAST  
REGIONAL COUNCIL

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FACSIMILE TRANSMISSION

DATE: 23-04-08

FACSIMILE NUMBER 03-768-7133

TO: WEST COAST REGIONAL COUNCIL

FROM: BARBARA MARSHALL

RE: SUBMISSION RE HOKITIKA  
POWER SCHEME

\_\_\_ No. of pages (including this one) being sent in this transmission. If you do not receive the standard number of pages, please advise immediately. My facsimile number (Fax and phone) is (04) 2338-244.



FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)

P.O. Box 1604, Wellington

1931  
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years  
2006

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24 April 2008

The Secretary  
West Coast Regional Council  
PO Box 66  
GREYMOUTH



Dear Secretary

**RE: SUBMISSION RE MOKIHINUI RIVER POWER SCHEME**

I enclose a copy of our submission on the above, a copy of which was faxed to you yesterday.

Yours sincerely

**Barbara Marshall**  
Secretary

**FAXED**

## Federated Mountain Clubs of NZ inc

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Wellington  
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23 April 2008

**To: West Coast Regional Council & Buller District Council**

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**Submissions in relation to: The Resource Consent applications to develop an Hydro Electric Power Scheme on the Mokihinui River, Seddonville, North Westland.**

### Consent List

Mokihinui River consents RC07150/1 – RC07150/6	<input type="checkbox"/>	Earthworks and Vegetation consents RC07150/14 – RC07150/19	<input type="checkbox"/>
Inundation Area consents RC07150/7 – RC07150/8	<input type="checkbox"/>	General Construction consents RC07150/20 – RC07150/23	<input type="checkbox"/>
Staging Area consents RC07150/9 – RC07150/10	<input type="checkbox"/>	Access Roads, Walking Tracks and Recreational Activities consents RC07150/24 – RC07150/26	<input type="checkbox"/>
Substation and Transmission consents RC07150/11 – RC07150/13	<input type="checkbox"/>		

**Buller District council consents**

**Buller District Plan - Relevant Resource Consent Applied For:**

<p>Land Use Consent Consent Number RC07/180-A</p>	<p>Dam, Staging Area &amp; Associated Infrastructure.</p>	<p>To undertake earthworks and vegetation clearance to construct, use and maintain a roller compacted concrete dam, diversion channel, penstocks, powerhouse, substation, tailrace, staging area (including aggregate extraction pit, stockpiling area, production plant, buildings exceeding bulk and height, settling ponds, diesel generators, water tanks), rock quarries, haul roads, permanent access roads, parking areas, tracks, substation and transformers, communication system; and associated infrastructure on land adjacent to the bed of the Mokihinui River. Noise and vibrations emissions from construction and lighting.</p> <p>Located approximately at the grid reference: NZMS 260 L28: 2916-6096</p>	<p>In perpetuity</p>
<p>Land Use Consent. Consent Number RC07/180-B</p>	<p>Inundation Area</p>	<p>To undertake earthworks and vegetation clearance to establish, repair and maintain the lake; and associated infrastructure including but not limited to slope stabilisation structures.</p> <p>Located approximately at the grid reference: between: reference between: NZMS 260 L28: 2916-6096 and 3974-6201</p>	<p>In perpetuity</p>
<p>Land Use Consent Consent Number RC07/180-C</p>	<p>Walking track</p>	<p>To undertake earthworks and vegetation clearance to construct, use and maintain an access track on the true left bank of the Mokihinui River; and associated infrastructure. To erect information signs about the dam and heritage sites</p> <p>Located approximately at the grid reference: between: NZMS 260 L28: 2907-6072 and 4143-6208</p>	<p>In perpetuity</p>

Land Use Consent Consent Number RC07/180-D	Dam Access Road & Power Supply	To undertake earthworks and vegetation clearance; to upgrade, use and maintain the existing Mokihinui-Seddonville road and bridges from the intersection with State Highway 67 to the construction site, erect new bridge at Burkes Ck; and to construct, use and maintain 33kV power poles and lines; and associated infrastructure.  Located approximately at the grid reference between: NZMS 260 L28: 2368-6355 and 2913-6086	In perpetuity
Land Use Consent Consent Number RC07/180-E	Transmission Poles, Lines, Substation and Access Tracks	To undertake earthworks and vegetation clearance; to construct, use and maintain 110 kV transmission poles, lines, substation, storage and use of hazardous substances, and lighting and access tracks.  Located approximately at the grid reference between: NZMS 260 L28: 2916-6096 and L29: 1347-3909	In perpetuity
Land Use Consent Consent Number RC07/180-F	Boat ramp/jetty	To undertake earthworks and vegetation clearance to construct, use and maintain the boat launching ramp and jetty facility, and associated infrastructure adjacent to the lake.  Located approximately at the grid reference: NZMS 260 L28: 2935-6075	In perpetuity
Land Use Consent Consent Number RC07/180-G	Log Boom	To erect, use and maintain a log boom on the surface of the lake and associated infrastructure, including log handling facilities.  Located approximately at the grid reference: NZMS 260 L28: 2935-6075	In perpetuity
Land Use Consent Consent Number RC07/180-H	Hazardous Substances	To use and store hazardous substances during the construction and the operation of the scheme.  Located approximately at the grid reference: NZMS 260 L28: 2916-6096	In perpetuity

Meridian Energy Limited seeks to extend the statutory lapsing period for all the above resource consents to 10 years.

### **Our Background and Interests – Federated Mountain Clubs of New Zealand**

Federated Mountain Clubs (FMC) is the national alliance of tramping, mountaineering and alpine clubs. FMC affiliates also engage in fishing, , canoeing, sea kayaking and mountain biking snow skiing etc. FMC was formed in 1931 to advocate for outdoor recreation and for the public ownership, protection, management and control of our natural wild lands in perpetuity and subject to that, use for public re-creation and enjoyment. FMC has been a major player in the development of our National Parks,

Forest / Conservation Park network and protecting lands and waters of high recreation and conservation value.

FMC is constitutionally committed to the protection and environmental enhancement of our indigenous wild lands, rivers, foreshores and coasts for the enjoyment and recreation of all New Zealanders.

We represent about 12 500 club and individual members throughout New Zealand.

FMC seeks that the decision makers decline all of the Resource Consent applications as listed in information provided by both the West Coast Regional and Buller District Councils.

Firstly, the FMC maintains that the Resource Consents applied for to create a Hydro Electric Power Scheme (HEPS), will require an unsustainable modification to topography and morphology of the wild river reaches, routes and tracks in the catchment.

Secondly, the outcome impacts of the HEPS on wild land recreations represent an additional unsustainable outcome in the way we relate socially to our wild lands. Our Valley systems are finite in number and as such the only renewable component of the proposal is the water.

**Rationale:** FMC is aware of the NZs growing demand for grid distributed electricity generation and recent government strategies to meet this demand in a way that minimises carbon discharges.

The Federations is opposed to this HEPS process because it wishes to ensure the is protection of wild land recreational opportunities that exist in the catchment. The electricity generation proposed for this scheme would satisfy the grid growth demand for only a very short period of time. New Zealand's electricity planning authorities should be developing more substantial long term power generation options

### **Submission on AEE Rev V2:**

AEE 1.2 FMC commends the applicant for its broad consideration of alternative energy generation and conservation beyond the scope of this application.

Though the 100000 tons of concrete, 1.38 million tons of concrete aggregate, and associated lake inundation areas and vegetation clearances add up to a large carbon foot print.

AEE 1.3.2: Physical Foot Print please confirm the context of the claimed foot print of 380ha, It is FMCs view the project footprint will be the entire lake, Dam and Power House structure and catchment below the dam affected by varying river flows and

sediment constraint into the local coastal zone. This is very likely to contribute to coastal erosion patterns creating a footprint which could cover over 1000ha.

#### AEE 1.4.2:

- DoC deemed Stewardship Land (approx. 221ha). Stewardship Land is managed for the protection of its natural and historic values but has no special protection status;

The FMC maintains that the land does have natural values. ( These need to be stated. Have we any botanical, geological authorities that can be called on to reinforce the opinions of the FMC arguing for its value as recreational land.)

The land required though stewardship designation and of no specific designation has no lesser conservation value by virtue of that than any other conservation land refer: Conservation act 1987.

- **Stewardship area** means a conservation area that is not—
  - (a) A marginal strip; or
  - (b) A watercourse area; or
  - (c) Land held under this Act for one or more of the purposes described in section [18\(1\)](#) of this Act; or
  - (d) Land in respect of which an interest is held under this Act for one or more of the purposes described in section [18\(1\)](#) of this Act:

That the area under application is not gazetted anything else does not mean it is not, it has not yet been assessed for such gazettal.

#### **Minister may confer additional specific protection or preservation requirements**

- (1) Subject to subsections [\(2\) to \(4\)](#) of this section, the Minister may, by notice in the Gazette describing the land concerned, declare any land or interest in land, held under this Act for conservation purposes to be held for the purpose of a conservation park, an ecological area, a sanctuary area, a wilderness area, for any other specified purpose or purposes, or for 2 or more of those purposes; and, subject to this Act, it shall thereafter so be held.

AEE 1.4.3 The applicant claimks that the generation capacity is for local use ie for West Coast consumers. This assertion is somewhat spurious given the fact that the charged grid acts like a net with pressure points at demand node points. Accepting most of the SI power goes from the southern hydro generators to the Bluff smelter and the North Island when available, the West Coasts share is small. Any power generated at Mokihinui will be available to the entire grid.

AEE1.4.4: The proposed transmission line will cross magnificent wild landscapes including ecological areas, requiring significant vegetation clearances of a 200m strip and provision fo service roading .

(Is the amount of new tracks quoted in 3.3.6 at 420metres correct, please confirm)  
Though some of it is modified landscape due to opencast coal mining, much of the Waimagaroa area is outstanding landscape recommended for protection under the Ngakawagh PNA programme report. It is excellent tramping country, furthermore, the natural wildlife a valuable asset; kiwis can be heard in the wild.

#### AEE 4.7. Landscape and natural character:

The site is relatively isolated and remote, and is not located within the West Coast's salient landscape features, namely the Southern Alps and the coastline. The site is in an area which is not on the 'beaten tourist track' and therefore is located in a low profile setting.

FMC disputes this assessment. Other remote, protected areas in the South Island fall outside generalised description of the Southern Alps and coastline" for example, Mt Richmond, and the conservation parks of Cenral Otago and the Canterbury foothills. To use this to devalue the landscape is wrong. Such remote and undeveloped qualities increase its value to the New Zealand cultural landscape setting. The area is well known and its remoteness inspires challenge and adventure among us.

#### AEE 4.7.1 Mokihinui Gorge: ( Something on preservation is missing here)

DoCs West Coast Conservation Management Strategy (CMS) describes the Mohilkinhui Gorge as :

The Mokihinui River Gorge displays a high level of landscape homogeneity. Because of the overriding similarity of landform through which the gorge passes, the view into it displays considerable landscape homogeneity. It therefore displays a high level of visual intactness that is reinforced by the bold simplicity of bush covered ridges, mountains and valleys.

There is an interface between the water body and the surrounding terrain, and the river is characterised by rapids and pools throughout the length of the gorge. A further characteristic of the river is its narrow proportions. This results from the steep and narrow valley that it flows through. The high mountains on either side contribute to this effect. The narrow width of the river emphasises the incised nature of the gorge.

FMC supports this assessment and it is this constrained entry to more open country above the gorge that defines the beauty and wildness of this place.

### *Freshwater rivers*

A national assessment undertaken in 2004 identified the most natural and representative river systems that contain a reasonably comprehensive range of New Zealand's freshwater ecosystems, communities and species, including threatened species (Chadderton *et al* 2004). These catchments contribute most to New Zealand's remaining freshwater biodiversity. Rivers in the West Coast *Tai Poutini* Conservancy whose entire catchments have been classified as nationally significant include: the Karamea River, Mokihinui River, Heaphy River, Fox River, Grey River headwaters, Maruia River, Upper Buller *Kawaitiri* River, Ahaura River, Cascade River, Karangarua River, Turnbull River, Okuru River, Waitatoto River, Arawhata River, Paringa River, Haast River (includes Landsborough River), Hokitika River, Cook River, Ōkārito River and Cockabulla Creek. The Buller *Kawaitiri* River is the second highest ranked catchment in New Zealand by natural heritage score.

### Also

The gazetted Tasman Wilderness Area (see Section 3.6.2.4) and Kahurangi and North Mokihinui remote zones (see Section 3.6.2.5) are protected for their particular values and provide opportunities for self-reliant recreation on nature's terms; consequently they have few facilities or services.

FMC contends: The improved access resulting from the lake will threaten the recreational wild land values expressed in the West Coast CMS? and valued by our members.

#### 4.2.2.7 Recreation and tourism in 2017

Categories<sup>53</sup> of recreational opportunities available in the Kawatiri Place include:

- the Tauranga Bay intense interest site (see red dot on Map 13);
- frontcountry sites located adjacent to formed and maintained roads (see green dots on Map 13);
- backcountry-remote zones (see yellow areas on Map 13); and
- remote zones (see purple areas on Map 13).

People are attracted to the wide range of recreational opportunities which Kawatiri Place offers and are able to use a variety of access methods to explore natural areas and discover historic treasures. Key features include the Buller *Kawaitiri* and Mokihinui rivers, with their white-water rafting opportunities,

## 4.2.2 DESIRED OUTCOME FOR KAWATIRI PLACE

Section 4.2.2 describes what the Kawatiri Place will be like in 2017 if the direction of this CMS is followed.

### 4.2.2.1 Place description

The Kawatiri Place includes the coastal districts from Kongahu Point (midway along the Karamea Bluff) in the north to Westport in the south, and inland includes the ranges and valleys north of the Buller *Kawatiri* River as far east as Newton Creek in the upper Buller gorge and virtually the entire catchment of the Mokihinui River (Maps 12-13). The southern boundary of this Place follows the Buller *Kawatiri* River from Inangahua township to the Coast Road turnoff, then down the Coast Road to the Nile River, just north of Charleston. A small area near the Matiri Range is gazetted as Kahurangi National Park (see yellow area on Map 12 and Section 4.2.1.9 above). Kawatiri contains the second largest town on the West Coast *Te Tai o Poutini*, Westport (population 5,800 as at 2007).

## CMS Mokihinui gorge

### 4.2.2.5 Geodiversity, landforms and landscapes in 2017

Kawatiri is the most geologically complex part of the Conservancy with the greatest diversity of landforms and varied landscapes. Among its most distinctive features are the deep gorges carved through the coastal ranges by the Buller *Kawatiri* and Mokihinui Rivers and the rolling uplands of the Denniston and Stockton coal plateau. The assemblage of parent rocks includes

FMC supports the maintenance of the track / route network. Much of it is of high historic recreation value and is confirmed in the West Coast – or is it Nelson? CMS:

Other frontcountry tracks include the short Chasm Creek track near Seddonville, an old benched miners' track to the historic Britannia Mine in the coastal hills between Granity and Waimangaroa, and the first section of the old inland route to Karamea via the Mokihinui gorge. The latter track continues through the gorge to the Mokihinui Forks.

### **Backcountry-remote and remote zones**

The Mokihinui catchment is managed primarily to provide the kind of challenging remote backcountry opportunities enjoyed by experienced New Zealanders and is maintained accordingly. A marked route is provided to the Mokihinui Forks Hut. In the north branch of the river the North Mokihinui remote zone provides opportunities for self-reliant recreation (e.g. hunting and tramping) on nature's terms and consequently has few facilities or services (see Section 3.6.2.5). The Goat Creek Hut provides accommodation in the south branch of the Mokihinui. Backcountry tramping tracks give access to areas such as the Glasgow Range and up Lyell Creek. No additional tracks or huts are constructed by the Department, but the potential for a marked route linking the Mokihinui and the Lyell is recognised.

Kayaking and rafting the rapids of the upper Buller and Mokihinui gorges are popular activities (see Section 3.6.5.6). Management of the Mokihinui catchment protects the opportunity for people to experience the remoteness, peace and natural quiet of the area and its natural, historical and cultural heritage values.



**AEE 4.8 Public Access and Amenity: FMC supports this view, but disputes whitebaiting being the main activity, given its seasonal nature, as being the main recreational activity.**

The main recreational use of the Mokihinui River is whitebaiting (below the SH67 bridge). There is also some whitewater kayaking and rafting, angling, mountain biking, hunting and tramping in the Mokihinui River area.

All activities require a high level of personal commitment and advanced planning when they occur above the dam site. This is due to the poor quality of the access track on the true left bank (Mokihinui River Track) from the Welcome Creek Road end, which is poorly formed and maintained. Rock falls have made the track dangerous, and in places the track is slippery when it rains.

Though the effects on whitebaiting by the proposal may be significant the degradation of the other outdoor recreations are also significant.

AEE

## 6.10 Recreation and Public Access

Appendix 17 of the AEE assesses in detail the actual or potential effects of the MHP on recreation effects, public access and amenity, and also include the methods to avoid, remedy or mitigate these effects; and the benefits derived from the proposal. An overview of the assessment of effects of the MHP on recreation, public access and amenity is outlined below.

### 6.10.1 Recreation Effects

No activity occurring between the dam site and The Forks has been rated as nationally significant. Angling, tramping and hunting in the proposed lake area are no more than of regional significance. Whitewater kayaking and rafting are the most important activities within the gorge, but are not of national significance. The Mokihinui River between the Mokihinui Forks and the Welcome Creek road end is of no more than regional significance for recreation.

The most significant effects of the proposal are the change to the rafting and white water opportunities in the catchment. While the North Branch will remain raftable and kayakable, including the short section between The Forks and the top of the lake, the need for alternative transport to the downstream end may diminish use of this section. However, should a boat transport service develop in the lake, the opportunity will still be available.

The white water setting in the main stem of the River will be removed. This cannot be avoided, but it is at least in part remedied or mitigated by a range of alternative recreational opportunities which will be created, including new kayaking and rafting opportunities.

Track redevelopment will enable increased walking and mountain bike access along the River to The Forks. Potential boat access options would reduce the need for anglers, particularly domestic anglers, to rely on the more expensive option of helicopter delivery, and this may see the reduction of one business opportunity with the creation of another.

Jet and power boating on the lake, if it were to be allowed at all (managed by BDC and DoC), would most likely require some form of control to limit the effects of noise on the remote experience opportunity in the catchment. This new form of recreation could potentially represent a new activity of some importance in the region. Hunters would benefit especially. Casual, independent recreational visitors to the catchment, besides white water rafters and kayakers, would be attracted to a more amenable and accessible setting.

Generally, the proposal will result in minor effects on relevant tourism service providers operating within the catchment.

The remote or wilderness fishery above The Forks, in the upper catchment, may have national significance for angling. There will be less than minor adverse effects on this area.

FMC does not support the premise above. The recreational use of the area for tramping is of national significance and by virtue of its remoteness and challenging aspects this significance is enhanced. This is supported in the numerous letters and campaigns to protect it from such severe modification

The more that areas such as this are modified generates a cumulative negative effect on our recreational heritage, values and experiences. .

AEE

### **6.10.2 Public Access**

The MHP will have no adverse effects on existing public access to and along the true right bank of the Mokihinui River from the Forks to the mouth, or the true left bank between the Staging Area and the mouth. Access to the coastal marine area as result of the proposed scheme will also not be impeded.

The transmission line, and Cedar Creek substation construction and operation will not adversely affect public access, including the Charming Creek and Coalbrookdale walkways.

Public access to and along the Mokihinui River from the Staging Area to the upstream end of the lake will need to be controlled during construction of the dam and associated infrastructure, and whilst trees are being cleared from the lake. This means that public access to and along the existing walking track on the true left bank could be restricted for up to five years. This is necessary to protect the health and safety of the public.

Construction of the dam and associated infrastructure will take three years to complete. Due to the nature of the construction activities (heavy machinery, blasting etc) the public will need to be fully excluded from this area.

It is considered that the adverse effects on public access associated with the restrictions outlined above will be minor because:

- The existing track is in poor condition, and is dangerous in places;
- It is used infrequently;
- Stopping and restricting public access will be temporary;

The track will be significantly upgraded as part of this proposal. The benefits associated with this upgrade are outlined below.

FMC challenges the claims of the applicant above: not only will the dam construction phase deny access for 3 years, when completed the values people visited the area for will be largely under water. It is the significance of the gorge and the challenge, described as dangerous in places, like many of our roads we continue to use and enjoy.

AEE

### **6.10.3 Actual of Potential Benefits**

Opportunities which could be provided by the new lake and walking track proposed with the MHP include:

- Enhanced pedestrian and mountain biking access along the Mokihinui River Track (which is also proposed by the draft CMS);
- A potentially popular flat water "sea-kayaking" and canoeing opportunity on the proposed lake, with associated commercial support (canoe and kayak hire, guiding);
- Potential water taxi service on the lake to below The Forks (subject to obtaining any necessary approvals), potentially obviating some helicopter activity in the backcountry-remote setting and enabling whitewater rafting and kayaking on the North Branch;
- Heritage asset developments via the relocation and interpretation of currently inaccessible and poorly-known mining artefacts;
- A lake angling opportunity with ready pedestrian and potential boat access (subject to obtaining any necessary approvals).

FMC does not support the premise of enhancement through the provision of modified recreational opportunities. It contends there is a need to preserve recreational opportunities in unmodified natural landscapes, as described above:

Certainly some new activities will be available in the place of the current gorge, but these are contrived, engineered and available at other sites, including the sea nearby.

Many of these activities could be provided now if there was a will and funding to do so. This is another example of the environment justifying and funding its own modification via a so called improvement, an improvement that in effect is not real but engineered, “build it and they will come” supposition. Our countries natural inherent values are a draw card the world over to constantly and irrevocably remove them is not sustainable behaviour, but document of decline.

FMC would like to see far more mitigation than just providing a little more than what is there now in the way of pedestrian recreation plus a sheet of flat water lake. The lake it's self and associated motorised noise will present a real loss of natural values.

**West Coast Regional Policy Statement:**

FMC believes that the unsustainability of the proposed scheme is contrary to provisions within the RMA and RPS (West Coast Regional Policy Statement 2000) including;

*14.1 Recognise the importance of an adequate supply of energy resources for the needs of people and communities on the West Coast, provided that this is not inconsistent with other policies in this RPS.*

*14.2 Promote sustainable management and efficient use of energy within the region.* NewZealanders should be encouraged to invest in their energy conservation and distributed solar hotwater and PV ( what is this?generation, reducing demand on the grid and our finite valleys.

*14.3 Cooperate with any crown initiatives and policies where practicable, that seek to promote greater energy conservation, efficient and use of renewable energy sources including the governments Voluntary agreement Scheme for net reduction of CO2 emissions.*

FMC has concerns that the amount of natural and modified forest and vegetation cover required to be removed or inundated. This is of an amount that will permanently impact on net CO2 sinking??? and this has not been accounted for as has the whole carbon content of the project. Refer [www.dams.org](http://www.dams.org)

**Heritage:** FMC has concerns that the proposal has issues in relation to the degradation of heritage aspects of the sidle tracks.

The application is not consistent with Heritage Objective 6 of the RPS.

*Objective 6: To Avoid, remedy or mitigate actual or potential adverse effects on resource use, development or protection on heritage and archaeological sites and values that contribute to the West Coast's distinctive character and sense of identity.*  
*Heritage Policy 6*

*6.1 Promote the identification and protection of heritage values of the region, which include the following:*

- a) Archaeological site;*
- b) Places or areas of special historical, cultural or architectural interest or significance;*
- c) Places or areas of intrinsic, recreational or amenity value of visual appeal;*

*Matters to be considered when considering heritage places or sites include:*

- a) The extent to which the place reflects important or representative aspects of New Zealand history;*
- b) The level of association of the place with events, persons or ideas of importance in the history of the (district / region);*
- c) The importance of the place to Poutini Ngai Tahu*
- d) The level of community association with, or public esteem for, the place;*
- e) The potential of the place for public education;*
- f) The level of technical accomplishment or value, design of the place including the rarity of technical accomplishment or design;*
- g) The symbolic or commemorative value of the place;*
- h) Whether it is an historic place known to date from early periods of the districts settlement i.e., such items are likely to be included in the schedule;*
- i) The rarity of the type of historic place;*
- j) The extent to which the place forms a key part of a wider historical and cultural complex or historical and cultural landscape.*

FMC opposes the 10year extension to the lapsing period.

FMC wishes to be heard at any Local Authority hearing or meeting in relation to this application.

Barbara Marshall  
Secretary.