



**NEW ZEALAND HISTORIC PLACES TRUST
SOUTHERN REGIONAL OFFICE**

F A X C O V E R S H E E T

DATE: 23/4/08

TO: WRC

FROM: nz Historic Places Trust

RE: Proposed Motihinaui Hydro Scheme
Number of pages including cover sheet: 8

TIME:

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RECEIVED
23 APR 2008
THE WEST COAST
REGIONAL COUNCIL

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Message :

See attached our submission for Motihinaui Hydro Scheme.

I will forward a hard copy to you in the post.

Regards Janne.



Patron:
His Excellency The Hon
Anand Satyanand, PCNZM
Governor General of New Zealand

Southern Regional Office
PO Box 4403
Christchurch
Phone: 377 9241

Our Ref: 33005-152
Your Ref: RC07150 & RC07180

23 April 2008

West Coast Regional Council and Buller District Council (C/- WCRC)
PO Box 66
Greymouth

**NOTICE OF
SUBMISSION ON A NOTIFIED APPLICATION FOR RESOURCE CONSENT
UNDER THE RESOURCE MANAGEMENT ACT 1991 FOR A PROPOSED
MOKIHINUI HYDRO SCHEME ON THE WEST COAST**

APPLICANT: Meridian Energy Ltd

Consents from West Coast Regional Council

- RC07150/01 – RC07150/6 – Mokihinui River
- RC07150/7 – RC07150/8 – Inundation Area
- RC07150/9 – RC07150/10 – Staging Area
- RC07150/11 – RC07150/13 – Substation and Transmission
- RC07150/14 – RC07150/19 – Earthworks and Vegetation
- RC07150/20 – RC07150/23 – General Construction
- RC07150/24 – RC07150/26 – Access roads, walking tracks and recreational activities

Consents from Buller District Council

- RC07180 – A Land use activities associated with Dam, Staging Area & Associated Infrastructure
- RC07180 – B Land use activities associated with the Inundation Area
- RC07180 – C Land use activities associated with the Walking Track
- RC07180 – D Land use activities associated with the Dam Access Road & Power Supply
- RC07180 – E Land use activities associated with Transmission Poles/Lines, Substation & Access Tracks
- RC07180 – F Land use activities associated with the Boat ramp/jetty
- RC07180 – G Land use activities associated with the Log Boom
- RC07180 – H Land use activities associated with the Use and Storage of Hazardous Substances

To: West Coast Regional Council and Buller District Council (c/- WCRC)
Name: New Zealand Historic Places Trust Pouhere Taonga
Southern Regional Office
P.O. Box 4403
Christchurch

STATEMENT OF SUBMISSION

Pursuant to Section 96 of the Resource Management Act 1991, the New Zealand Historic Places Trust Pouhere Taonga (NZHPT) makes the following submission:

The NZHPT *opposes in part*, the application of Meridian Energy for the proposed Mokihinui Hydro Scheme.

NZHPT position is as follows

The NZHPT is New Zealand's leading national historic heritage agency. The work of the NZHPT is shaped by the Historic Places Act 1993. The purpose of the act is to 'promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand'. There are over 5000 heritage places and areas registered under the Historic Places Act 1993 as Historic Places, Historic Areas, Wahi Tapu and Wahi Tahu areas.

Details of our submission are as follows:

The reason for our submission is to ensure that under Section 6 of the RMA, matters of national importance (RMA Section 6f) "the protection of historic heritage from inappropriate subdivision, use and development" are recognised and provided for.

Archaeology

Appendix 16 of the resource consent application includes an archaeological assessment. The assessment has been undertaken in the Mokihinui River Valley where the proposed hydro dam and 335 hectare 'ribbon lake' inundation area are proposed. Prior to the assessment being undertaken there were 2 sites recorded with NZ Archaeological Association being L28/1 occupation site at the mouth of the river and L28/7 historic packtrack. As a result of the field work 6 new sites have been recorded. Mokihinui has a significant early history associated with the gold rushes between 1865 and 1880. Prospecting and small scale mining continued until the 1940's. NZ Historic Places Trust has not been consulted during the drafting and completion of this archaeological assessment.

Additional areas to be surveyed

The assessment discusses a preliminary assessment of Anderson's Flat to be further discussed however this has not been undertaken. NZHPT requests that a specific archaeological assessment of this area is undertaken, as well as other areas not identified in the assessment: such as Tylers and the hut site beside the main track above the Rough and Tumble bridge.

In addition, due to the projected increased rate of erosion at the coastline/river mouth we request an archaeological assessment and survey should be extended to that area.

Historic Packtrack

As part of the archaeological assessment no specific assessment or survey was undertaken of the historic packtrack. Given the extent and importance of the packtrack (approximately 13km) NZHPT requests that the applicant undertake a specific archaeological assessment and survey of the packtrack in order to determine the significance and affects of this feature.

Mitigation measures have been identified in the archaeological assessment, which include:

- Detailed archaeological recording of all features located within the area of Seatonville and including the Jones Creek Battery (mapping and photography of all features and artefacts located at the sites).
- Limited excavation of some of the hut sites at the historic settlement of Seatonville and adjacent to the compressor site in order to obtain archaeological information.
- Collection of all loose historic artefacts located within the inundation area following location recording. These should be catalogued and appropriately stored until such time as appropriate presentation or final storage can be determined. For larger items, preference is that these remain within the Seatonville area so that they can be presented and interpreted within their original environment.
- Any redevelopment of the walking track from Seddonville to Mokihinui Forks should include interpretation of the old track, the bridge and historic access up Rough and Tumble Creek to Karamea, and interpretation at Seatonville. It should be made clear on this track that it is a new track and is not the original historic track up the valley.
- The location of the Russell Crosses should be recorded and following inundation of the area these should be relocated on the new track, as close to their current location as possible.
- All contractors working on the project, particularly in association with the construction of the transmission line, should be made aware of the potential to locate isolated historic and sites associated with either mining or timber extraction and milling, and the protocols to follow should this occur, as outlined in Meridian's Archaeological Site Discovery Protocol.

While these mitigation measures have been proposed in the archaeological assessment the final conditions and mitigation measures will be subject to the archaeological authority

process. Consultation with the NZ Historic Places Trust is necessary to avoid conflict between the Resource Management Act and Historic Places Act processes.

Proposed area of Transmission Line

In addition to the hydro dam and inundation area a new transmission line is proposed to run from the dam site across the Stockton Plateau to link with the existing Inangahua – Waimangaroa 110kV transmission line in the upper Waimangaroa Valley, a total length of approximately 29km. The applicant is investigating a 200m wide transmission corridor rather than an identified line at this stage as this allows potential to be flexible in the location of poles within the identified corridor. The mitigation measures identified in the archaeological assessment relies on an Accidental Discovery Protocol for the proposed transmission line, however NZHPT requests that an extensive archaeological assessment and field survey is undertaken of the alignment of the proposed transmission line. The line runs through the Stockton Plateau and adjacent to the Charming Creek Walkway (which is recorded with NZ Archaeological Association and is an actively managed historic site managed by Department of Conservation). Both of these areas have a significant early mining history. Additionally the transmission line ceases within close proximity to Burnetts Face at Denniston which is a *registered historic area* with NZ Historic Places Trust. The applicant has indicated there will be access roads around the transmission line which may have an impact on archaeological values. We request that these access roads are kept to a minimum and mitigation measures are put in place with regard to appropriate reinstatement of vegetation. NZHPT requests that an archaeological assessment and survey is undertaken in accordance with *NZHPT Guidelines for Writing Archaeological Assessments* to determine the values within these areas and the impacts the proposed works may have on these sites. This is a consistent approach throughout the country, for example currently Transpower are undertaking comprehensive archaeological assessments and surveys for the proposed transmission line between Waikato and Auckland.

Proposed Interpretation

As mitigation measures the archaeological assessment discusses any redevelopment of the walking track to include interpretation of the historic packtrack, bridge and historic access up Rough and Tumble Creek and appropriate storage of artefacts. NZHPT requests that an overall *interpretation concept plan* is undertaken by a qualified heritage professional to determine a consistent overall approach to interpretation at the site and funds are made available for its implementation.

Under the Historic Places Act 1993 (HPA) archaeological sites are defined as any place associated with human activity prior to 1900, where evidence relating to the history of New Zealand can be investigated using archaeological methods.

Wherever possible, the destruction, damage or modification of archaeological sites should be avoided or minimized. Integration with archaeological processes under the HPA is essential. Under the HPA the definition of an archaeological site is:

“any place in New Zealand that –

- a) Either –
 - i. Was associated with human activity that occurred before 1900; or

- ii. Is the site of the wreck of any vessel where that wreck occurred before 1900; and
- iii. Is or may be able through investigation by archaeological methods to provide evidence relating to the history of New Zealand."

Archaeological Authority

Under the HPA it is unlawful to alter, modify or destroy an archaeological site without an archaeological authority from NZHPT to do so. Under the act the NZHPT has a statutory timeframe of up to 3 months to process an authority application.

Cultural Values

As stated in the archaeological assessment little is recorded of the traditional or pre-European history of the Mokihinui River Valley, although several historic accounts refer to the valley as being used as an inland route to Karamea and the north. There is little evidence of pre-European archaeological sites in the area and the only Maori site recorded with NZ Archaeological Association is an occupation site recorded at the mouth of the river (L38/1), which will not be affected by this proposal.

Schedule 1C of the Proposed Water Management Plan for the West Coast identifies a schedule of *spiritual and cultural beliefs, values and uses to Poutini Ngai Tahu*. Mokihinui River is identified as having the following values - waahi taonga, mahinga kai, kohanga, navigation routes, cultural materials, waipuna and traditional campsite.

NZHPT requests that further consultation is undertaken with Te Runanga o Ngati Waewae (as Manawhenua in accordance with the provisions of the Te Runanga o Ngai Tahu Act 1996 and the RMA 1990) regarding the cultural heritage significance of the area. NZHPT understands that a Cultural Impact Assessment (CIA) is currently being prepared by Te Runanga o Ngati Waewae which will determine effects of Meridian's proposal on those identified values. Additionally, NZHPT requests that consultation is undertaken with the Te Tau Ihu tribes whose manawhenua interests within the area of the Mokihinui Hydro scheme have been recognized in the 2007 Waitangi Tribunal preliminary report WAI 785 (Te Tau Ihu o te Waka a Maui). NZHPT requests that any concerns of these manawhenua interests are taken into account and mitigated for.

The NZHPT seeks the following decision:

NZHPT requests Council place the application on hold, so that further information requests (pursuant to Section 92(1) of the RMA) can be made in respect of the following information:

NZHPT requests that the applicant commissions a professionally qualified archaeologist to undertake an archaeological assessment of the historic packtrack, the alignment of proposed transmission lines and the other areas detailed in the submission, to determine the effects of the activities on archaeological values.

NZHPT requests that an overall *interpretation concept plan* is undertaken by a qualified heritage professional to determine a consistent overall approach to interpretation at the site and funds are made available for its implementation.

NZHPT requests that further consultation is undertaken with Te Runanga o Ngati Waewae (as Manawhenua in accordance with the provisions of the Te Runanga o Ngai Tahu Act 1996 and the RMA 1990) regarding the cultural heritage significance of the area. Additionally, NZHPT requests that consultation is undertaken with the Te Tau Ihu tribes whose manawhenua interests within the area of the Mokihinui Hydro scheme have been recognized in the 2007 Waitangi Tribunal preliminary report WAI 785 (Te Tau Ihu o te Waka a Maui). NZHPT requests that any concerns of these manawhenua interests are taken into account and mitigated for.

Should consents be granted, the following *advice note* is to be included in the conditions of the consent in addition to the requests outlined above.

There are recorded archaeological sites in the vicinity of the proposed work. The applicant is advised to contact NZ Historic Places Trust for further information. Work affecting archaeological sites is subject to a consent process under the Historic Places Act 1993. If any work associated with this proposal, such as earthworks, fencing or landscaping, may modify, damage or destroy any archaeological site(s), an authority (consent) from the New Zealand Historic Places Trust must be obtained for the work prior to commencement. It is an offence to damage or destroy a site for any purpose without an authority. The Historic Places Act 1993 contains penalties for unauthorised site damage.

NZHPT will review our submission on receipt of the further information.

The NZHPT do wish to be heard in support of this submission.



SIGNED

Malcolm Duff
General Manager Southern

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