



30 January 2009

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

**SUBMISSION OF NEW ZEALAND HISTORIC PLACES TRUST POUHERE TAONGA
TO RESOURCE CONSENT APPLICATION, HYDRO DEVELOPMENT LTD,
PROPOSED STOCKTON PLATEAU HYDRO PROJECT.**

The NZ Historic Places Trust's (NZHPT) submission relates to historic heritage matters.

NZHPT **opposes** the application of Hydro Development Ltd for the proposed Stockton Plateau Hydro Project (the project) in relation to the construction of the Weka Reservoir, the Mt William Reservoir and associated works.

1.0 Principles in Assessing Historic Heritage

The reason for the NZHPT 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" is recognised and provided for.

NZHPT is guided by the principles of the Historic Places Act 1993 in assessing the potential effects on historic heritage values. The principles include 'taking account of material of cultural heritage value and involve the least possible alteration or loss of it' and 'safeguarding the options of present and future generations'.¹

NZHPT's position is also guided by the standards outlined in the *Sustainable Management of Historic Heritage Guidance Series*. This guidance series includes principles and standards for the assessment of impacts on historic sites, including archaeological sites (Information Sheet No.19).² As outlined in the information sheet:

NZHPT notes the area would also be subject to Policy for Government Departments' Management of Historic Heritage 2004 in relation to historic heritage on Crown land under DOC management.

2.0 The Historic Landscape of the Stockton Plateau

The Stockton plateau is a historic coal mining landscape. Mining began in the area during the 1870s with the opening of the Albion Mine. The largest mining operations included the Millerton, opened in 1896, by the Westport Coal Company and in 1908, the Westport-Stockton mine was opened by the Westport-Stockton Coal Company.³

¹ Section 4, Historic Places Act 1993

² http://www.historic.org.nz/publications/SustMgt_guidance_series.html

³ Katharine Watson, 'Stockton Plateau Hydro Project: An assessment of the effects on archaeological values', unpublished report for Hydro Developments Ltd, September 2008: pp. 9 – 10.

The topography and isolation of Stockton plateau meant that innovative and technologically challenging methods of transport and access were required. The Millerton mine was served by the Millerton incline which enabled coal to be transported from the plateau to the town of Granity and Westport Harbour. The Westport-Stockton mine required the construction of a railway line from the mine to the top of an incline at Swampy Flat. The railway, known as the 'Electric Loco Line', was New Zealand's first electric railway line.⁴

The *Assessment of effects on archaeological values*, Appendix A of the *Resource consent application and Assessment of Environmental Effects* (the application), has described the remains of the historic mining landscape existing today. This landscape included the mines, mining village (Tintown), the Fly Creek Workings, Granity Bins, and the Electric Loco Line and comprises of a range of archaeological features including the railway embankment, tunnels, bridges, power poles, foundations and artefacts.

3.0 Impacts of the Proposed Project on Historic Heritage

The proposed project involves:

- Mt William reservoir at the confluence of the Plover and Fly Streams on the St Patrick Stream to the east of Mt William. The storage reservoir will inundate an area of approximately 50 hectares.
- Fives streams will be captured and diverted into the Mt William storage reservoir being: T31, Fly, Plover, St Patrick and Darcy streams.
- Weka reservoir at the confluence of Weka and Sandy Creeks near Tin Town corner and will inundate an area of approximately 28 hectares.
- Five streams will be captured and diverted into the Weka storage reservoir being: Weka, Sandy, Upper Mine, Mangatini and A.J. streams.
- The Stockton tunnel, approximately 3850m long, will connect the Mt William reservoir and the Weka storage reservoir.
- The Granity tunnel which connects the Weka reservoir to the ocean outfall at Granity.
- An ocean outfall.

The project will involve major earthworks and areas of inundation. These activities will affect historic heritage in relation to:

- The inundation of a 460 metre long section of the Electric Loco Line by the Weka Dam.
- Realignment of the haul road and associated earthworks which may destroy parts of the Electric Loco Line.
- Inundation of a later branch of the Electric Loco Line at the Fly Creek Workings by the Mt William reservoir.
- The inundation of part of the historic settlement of Tintown.

⁴ *ibid*, p 10

The construction of the Weka Dam will inundate a 460 metre long section of the Electric Loco Line as detailed in Plan C-007 in Volume 2 (supporting documentation) of the application. In the *Assessment of effects on archaeological values* (Appendix A), Watson notes:

This section of the loco line is significant because it contains a number of features not seen elsewhere on the line, including a siding and a points mechanism. There is also an in situ bridge here, as well as examples of the line on an embankment and running through small cuttings. This section of the line is also one of the longer sections of intact line between the top of the incline and the entrance to A tunnel (with the exception of that section immediately below A tunnel). As such, this is an important section of line and should not be disturbed in any way, including by being flooded.⁵

In contrast, in the application, the applicant states:

“... of the approximately 4500 m length of the formation surveyed, 460 m will be inundated by Weka reservoir and a very small area inundated by the Mt William reservoir. These areas will be inundated less than 50% of the time, as they are at the upper range of the reservoir operating levels. By far the bulk of the loco formation is not affected by the Project.”⁶

The importance of the Electric Loco Line, as a historic engineered route, relates to its route and the associated surroundings and infrastructure, including Tintown and the Fly Creek Workings. While parts of the Electric Loco Line have been damaged by the haul road and other activities, NZHPT considers the line has integrity since, as described in the *Assessment of effects on archaeological values*, “it is possible to follow most of the length of the line and those sections that do remain are in good condition.”⁷

On the basis of the existing research, NZHPT considers the Stockton plateau has high historic heritage values. These values include historical, archaeological, educational and technological values as described in the *Assessment of effects on archaeological values*. The Electric Loco Line has particularly high historic heritage values on the basis that it was the first in NZ and also potentially the only industrial line: it is therefore rare and of high technological value.

NZHPT considers that the remains of the Electric Loco Line and its associated infrastructure is historic heritage of national importance and therefore must be protected from inappropriate subdivision, use and development.

NZHPT considers that, while the re-routing of the haul road has been designed to avoid extant sections of the Electric Loco Line formation, the project does not avoid destruction and damage to 460 metres of the Electric Loco Line that will be flooded by the Weka Dam. While the proposed construction of Weka Dam will only affect approximately ten percent of the 4500 metres of the Electric Loco Line formation, it is one of the longer sections of intact line and a section where features are present that are not represented on the remainder of the line. The significance of the section of the line proposed for inundation cannot therefore be directly calculated by the percentage of line affected.

NZHPT considers that greater or total conservation benefits are not achieved because the effects of the construction of the Weka Dam as proposed will have a major impact

⁵ *ibid*, p 35

⁶ Hydro Developments Ltd, *Resource Consent Application and AEE for the Stockton Plateau Hydro Scheme*, p 93

⁷ *ibid*, p 27

on the remaining Electric Loco Line formation. The 460 metre part of the Electric Loco Line affected has high integrity and should be protected for present and future generations. Consideration should be given to alternative options for construction which would minimise the effects on historic heritage.

In other areas affected by construction, there is potential for activities to impact on the remains of the Electric Loco Line formation. The applicant has proposed conditions of consent requiring:

- Haul road relocation will be laid out to minimise any further damage to the Electric Loco Line formation;
- Remaining sections of the Electric Loco Line formation within HDL land will be protected and consultation with DOC and SENZ will occur to establish mechanisms for protecting the formation on adjoining land.

Rather than minimising impact to the Electric Loco Line formation, buffer zones should be established alongside the proposed routes of the haul road and access roads prior to construction commencing to avoid damage to the Electric Loco Line formation.

An accidental discovery protocol for archaeology and the training for contractors in the recognition, reporting and management of archaeological material has been proposed for work in the area of the Granity Bins; however, these protocols and training should be extended to the entire project area.

In addition, other impacts on historic heritage have been identified and measures have been proposed by the applicant which go some way to mitigation. Should resource consent be granted, NZHPT wishes to provide input to the details of consent conditions at a later stage in the consent process.

4.0 Maori Cultural Values

NZHPT understands that consultation is being undertaken by Hydro Development Limited 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 affected by the proposed Stockton Plateau Hydro Project. In addition, NZHPT requests that consultation is undertaken with the Te Tau Ihu tribes whose manawhenua interests within the area of the proposed Hydro Project have been recognised in the 2008 Waitangi Tribunal Report on Te Tau Ihu o Te Waka a Maui: Report on northern South Island Claims (WAI 785) released on 22 November, 2008.

5.0 Historic Places Act 1993

Historic heritage identified by research to date indicates that all features post-date 1900. Should further research or investigation identify any sites, structures or features that date prior to 1900, the applicant is advised that the archaeological provisions of the Historic Places Act would apply and a consent application to the NZ Historic Places Trust would be required.

6.0 Requested Decision

In view of the potential effect on historic heritage, NZHPT requests that the consent authorities **decline** resource consent in relation to the construction of the Weka Reservoir, Mt Williams Reservoir and associated works.

NZHPT wishes to appear in support of this submission.

Signed



Malcolm Duff
General Manger Southern
New Zealand Historic Places Trust
Pouhere Taonga

Address for service:

Janine Dunlop
Heritage Adviser (Planner)
Southern Regional Office
PO Box 4403
Christchurch
Phone 03 377-9241
Fax 03 374-2433

Copies:

inhill@xtra.co.nz

Rebecca Inwood
Hydro Developments Ltd Consents Manager