



Department of Conservation  
*Te Papa Atawhai*

Our Reference: SAR 05 122 04

30 January 2009

West Coast Regional Council  
388 Main South Road,  
PO Box 66  
GREYMOUTH 7840

Dear Sir or Madam,

Re: Hydro Developments Limited- Stockton Plateau Hydro Project

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

You will note that there are aspects of the application which I support. However, the submission also opposes some aspects of the proposal. The Department of Conservation considers that the concerns identified can quite likely be addressed through further information, refinements to the application, and/or appropriate consent conditions. I would like to clarify that the Department is aware of and not opposed to the development of sustainable energy resources, but needs to be satisfied that any effects on conservation values are appropriately managed.

We would like to meet with yourselves and the applicants to explore suitable options for mitigating the Department's concerns. Please let me know suitable dates for meeting, and who on behalf of the Councils would be attending, so that I can coordinate the relevant Departmental staff for attendance.

Please contact Stephanie Grogan at (03) 756 9147 to make arrangements for a meeting, or if you have any comments or queries regarding the submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Stevens'.

Kelly Stevens  
Acting Community Relations Manager  
Department of Conservation, West Coast Conservancy Office

## RESOURCE MANAGEMENT ACT 1991

**TO:** West Coast Regional Council and Buller District Council

**SUBMISSION ON:** Application to build a Hydro Electric power scheme on the Stockton Plateau including the construction of two reservoirs and associated power stations and an underground pipeline with outfall discharging in the CMA.

**APPLICANT:** Stockton Plateau/Hydro Developments Limited

**SUBMISSION BY:** The Director General of Conservation

**ADDRESS:** Department of Conservation  
Private Bag 701  
HOKITIKA

Pursuant to Section 96(1) of the Resource Management Act (1991), I, Kelly Stevens, Acting Community Relations Manager (West Coast Conservancy) of the Department of Conservation, acting under an instrument of delegation from the Minister of Conservation, make the following submission on the above application.

There are aspects of the application which I support. However, there are also some aspects of the proposal where insufficient information has been presented with the application, or where significant adverse environmental effects have been identified but not appropriately avoided, remedied or mitigated. While we oppose these aspects of the application, we consider these matters can quite likely be addressed through the submission of further information, refinements to the application and/or appropriate consent conditions. My submission relates to the entire application for consents and is as follows:

1. I recognise that the intent is to reduce the contamination in the tributaries of the Ngakawau catchment, while providing for the social and economic wellbeing of the community, through the generation of electricity from a renewable energy source, and that is supported.
2. However, in some respects this application fails to promote the sustainable management of the natural and physical resources of the environment as required under Part II of the RMA, and in particular sections 5, 6 and 7.
3. While the applicant has provided some mitigation measures, the proposal does not avoid, remedy or mitigate all significant adverse effects on the environment.

4. In particular, the application does not avoid remedy or mitigate the adverse effects that the activity will have on a historic site of national significance, the Electric Loco Line (Historic Reference no 109 in the Buller District Plan).
5. The applicant proposes a number of mitigation measures in relation to flora and fauna that may be affected by the scheme. Appropriate management and monitoring plans should be developed in order to implement these measures and the Department would like to be consulted as part of their development.
6. The application fails to accurately quantify the effects of the proposal on the coastal and freshwater environment. The adequacy of the mitigation measures or the full extent of the effects cannot be properly addressed by interested parties until the following issues are addressed:
  - a) The aquatic/hydrological information provided in the application is not up to date and does not take in to account the current activities of SENZ including their water treatment systems and any monitoring data that may be available in this regard;
  - b) The aquatic/hydrological information provided does not address the long term management issues associated with the adjacent Coal Mining Licence and the effects this may have on the tributaries the proposal will intercept including the likely monitoring scheme to be implemented should this application be approved and any subsequent changes SENZ may make to their water treatment systems.
  - b) The freshwater baseline data for all affected tributaries is not adequate to assess the actual and potential effects of the proposed activity, be they positive or negative on the surrounding environment.
  - c) The Assessment of Offshore Acid Mine Drainage and Effluent Disposal (Cawthron report No. 1537) makes the comment that the extent of the plume dispersion is beyond the scope of this report (p 32), however no further investigation is presented by the applicant.
  - d) The Cawthron Report also states that effects from low pH and potentially toxic contaminants, in the marine environment are said to be either negligible or require further investigation to quantify (p 31); this issue requires clarification and again no further investigation is presented by the applicant particularly relating to the effects this may have on resident biota, such as the Hector's dolphin.
7. I also seek that the application be determined in accordance with the New Zealand Coastal Policy Statement (NZCPS) and the Regional Coastal Plan for the West Coast, with particular regard being given to:
  - (i) Policy 1.1.4 of the NZCPS, which states that it is a national priority to preserve the natural character of the coastal environment to protect the integrity, functioning, and resilience of the coastal environment, and also Policies 3.3.1 and 3.2.2 of the NZCPS; and

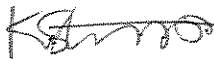
- (ii) Objectives 5.3.1, 5.3.2, 5.3.3, 10.3.2, 10.3.3, 10.3.4, 10.3.5 and Policies 5.4.1.8, 5.4.2.1, 5.4.2.2, 5.4.2.4, 10.4.1, 10.4.2, 10.4.3, 10.4.5 of the Regional Coastal Plan; and
- (iii) all other relevant provisions in the NZCPS and the Regional Coastal Plan.

8. If the further information outlined in this submission is provided, a suite of detailed conditions will be required to ensure that any consents issued appropriately avoid, remedy or mitigate adverse effects, and meet the requirements of sections 6, 7 and 8 of the Act so as to promote the purpose set out in Section 5. I oppose the application in the absence of such appropriate and detailed conditions which adequately avoid, remedy or mitigate the adverse effects on the environment of the proposed hydro scheme, and any associated infrastructure subject to this application.

I do wish to be heard in support of this submission.

A copy of the Instrument of Delegation may be inspected at the office of the Director-General of Conservation, Wellington.

Dated in Hokitika this 30<sup>th</sup> day of January 2009.



Kelly Stevens  
Acting Community Relations Manager  
Department of Conservation  
acting on behalf of the  
Director-General of Conservation

Address for service:  
Department of Conservation  
Private Bag 701 7842  
HOKITIKA