



We **support** all the applications on the Consent List at the end of this submission.

### **Our Submission is that:**

#### Local Effects

- The Ngakawau River is a class IV – V whitewater run. Kayakers carry their boats from the Charming Creek Walkway car park to the confluence at Mangatini Falls, then kayak down the gorge. It has been kayaked at a variety of flows, though usually it needs some recent rain.
- According to the Assessment of Environmental Effects, the Stockton Plateau Hydro Project is likely to reduce average flow in the Ngakawau River by 17%.
- At the same time it is likely to significantly improve water quality in the river. The Ngakawau is heavily polluted by mining run-off from the streams on the plateau, and most of these would be diverted by the project.
- The reduction in flow would result in a modification in the timing for when the Ngakawau is in a kayakable state, as it would need to be run sooner after rain. It would also result in an overall reduction of the number of days when it is kayakable, though it is difficult to determine exactly what this reduction would be as it is difficult to relate measured flow to the visual gauge used by kayakers. According to the “Ngakawau Restoration Project Hydrology and Water Quality Review” document (figure 5-26) , the mean flow in the Ngakawau between Mangatini Falls and Mine Creek will drop from approximately 27.5 cumecs to 22.5 cumecs
- Another difficulty is that whilst flow-duration curves were provided in the document for Mine Creek, Mangatini Stream and St Patrick’s Stream, they were not provided for the Ngakawau River itself.
- The reduction in kayakable days would be somewhat offset by the improvement in the amenity when it is kayakable due to the improved water quality.
- On balance, and assuming the AEE is correct in that the drop in flow will only be 17% whilst water quality will be improved, the consensus opinion amongst kayakers is that it is unlikely that the overall kayaking amenity will be significantly degraded by the Stockton Plateau Hydro project

#### Regional Effects

- It is the understanding of the NZRCA that there is currently about 19 MW of generation capacity on the West Coast, however this only supplies about half of the annual demand of 220 GWh (25 MW on average).
- This information comes from the West Coast Region Renewable Energy Assessment (Sinclair Knight Mertz, 4 August 2008) eg from page 1 of the executive summary “*At present, the West Coast Region is dependent on the national grid for about half of its electricity. Currently the installed generation capacity in the region is around 19 MW with electricity demand currently about 220 GWh per annum. No new generation is currently known to be committed in the region. TrustPower and Meridian Energy have applied for resource consents for their proposed 46 MW Arnold and 65-85 MW Mokihinui hydroelectric power plants respectively. By 2017 peak demand is predicted to be increased to 85-95 MW. This demand is likely to be generated by a small number of developments in the region such as those proposed by the Pike River Coal mine and expansions at the Westland Milk Products dairy factory at Hokitika*”
- Consents for the Arnold Scheme have been mostly approved, pending some appeals in Environment Court. If the Arnold is implemented, by 2017 there is a predicted deficit in generation capacity of approximately 15 MW.
- The Stockton Hydro Project with a base generation capacity of 25 MW would easily account for this deficit.
- It is the understanding of the NZRCA that there is only limited transmission capacity into or out of the Coast, and therefore that the Arnold and Stockton Plateau projects should eliminate the need for other mooted projects such as the Mokihinui, Matakītaki, and Waitaha.

- The Mokihinui, Matakītaki, and Waitaha are all rivers with high kayaking and natural amenity values. NZRCA does not support the damming of these or any other highly valued rivers.
- On this basis, and given there does not seem to be significant degradation in the kayaking amenity afforded by the Ngakawau River, the NZRCA conditionally supports the granting of consents for the Stockton Plateau Hydro Project.

**We seek the following decision from the local authority:**

- On balance, NZRCA seeks a decision that all consents listed below be granted.

We make our submission concerning **all** the consent applications listed below

We **wish to be heard** in support of my/our submission.

**Signed:**

Tony Ward-Holmes (NZRCA South Island Conservation Officer)

30/01/09

We **have** served a copy of my/our submission on Hydro Developments Ltd as per Section 96(4) of the RMA **yes**

Consent list

RC08149/1 – RC08149/8 Coastal permits	<input type="radio"/>	RC08149/9 – RC08149/13 Land Use Consents for earthworks and vegetation removal	<input type="radio"/>
RC08149/14 – RC08149/20 Land Use Consents to disturb river and stream beds	<input type="radio"/>	RC08149/21 – RC08149/32 Water Permits to take, use, dam and divert water	<input type="radio"/>
RC08149/33 – RC08149/38 Discharge to water permits	<input type="radio"/>	RC08149/39 – RC08149/41 Discharge to land permits	<input type="radio"/>
RC08149/42 Discharge to air permit	<input type="radio"/>		