

Comment on behalf of West Coast Tai Poutini Conservation Board

By Stewart Robertson

At the hearing Tuesday 4th August on HDL Stockton Plateau Hydro application

My name is Stewart Robertson .

I'm speaking on behalf of the West Coast Tai Poutini Conservation Board

On that Board I am the chair of the Planning Sub-Committee.

Thank you for the opportunity to speak in support of this application by Hydro-Developments Ltd.

I intend to reiterate the Board's original submission with some additional and interpretive comment

(Additional comments are in parentheses).

In the time since the Board made its submission, more information has been available on the West Coast Regional Council website and I'll make some reference to that where it relates to our submission.

Reasons for support

The Board recognises that this scheme represents the production of energy from a renewable resource and in the process should succeed in effectively managing ongoing environmental pollution problems relating to acid mine drainage.

(These are broad reasons for support common to many submissions)

In reaching its supportive position the Board considered positive outcomes and adverse effects

Positive outcomes

- The scheme involves generation of electrical energy from renewable resources avoiding the adverse effects of extraction and consumption of fossil fuels.
(This is in line with the current direction of government policy and indeed international policy)
- The proposed transmission of electricity by existing transmission liner avoids adverse effects on the landscape of construction of new transmission corridors.
- The scheme will make a significant contribution to West Coast electricity generation.
- The intention to use of the electricity locally avoids energy losses which would result from transmission over long distances.
- Visual intrusion on the landscape will be minimised by building underground and tunnelling.
(The Board notes that there remains a requirement for more detail about construction matters including tunnelling.)
- Scheme has the potential to be expanded.
- A solution to an existing pollution problem will be achieved by dispersal and dilution of acid mine drainage through a new ocean outfall. As a result the adverse effects of acid mine drainage on the watercourse ecology will cease as well as the costly chemical control currently being employed.
(The Joint Planning Officers' Report –JPOR- suggests that this benefit is overstated however the Board still sees value in a gain in the control of AMD)
- The land being used has been highly modified in the past through extensive mining. As a result the two new reservoirs should not detract from the visual amenity. The Board does not consider the affected landscape to be naturally outstanding and so does not ask for the protection which Section 6b of the Resource Management Act would offer.
- The project has considerable local support.

(over)

Adverse Effects

The Board notes the following adverse effects of the proposal and requests that where practicable, conditions be put in place to limit these.

- Loss of Public Conservation Land is significant as the conservation estate is finite and the loss is long-term. However the fact that it is highly modified land is a mitigative factor in that conservation values are not high with respect to landscape flora and fauna. Conversely there are historical factors associated with the previous land use. The Board would recommend that a land exchange for a portion of land of higher conservation value would be a good outcome. (It appears that a land exchange has yet to be successfully negotiated and the Board asks that this option be pursued to an acceptable conclusion as it is seen as an important mitigative element)
- The remnants of the Electric Locomotive Line will be adversely affected by the proposal. It is agreed by all that the losses to inundation and road re-alignment will be significant and permanent. Whilst the present increased interest will allow accurate recording of these remnants for future educational and interpretive use, it is difficult to envisage any meaningful mitigation. The Board asks that every effort is made to minimise the adverse effects on this original electric locomotive line due to its rarity value ; being the first of its kind in New Zealand.
(This heritage issue has received a lot of attention. HDL's mitigative measures involving the haul road and a proposed walking track do not appear to compensate for the loss of an important section of loco track to inundation. The Board suggests that more could be done with the unaffected part of the historic line.)
- The outflow of the water used for electricity generation will be acidic and adversely affect the marine ecology of the surrounding sea and seabed.
The commissioned report suggests that the dilution of the acidic outflow will rapidly reduce the acidity, toxicity and turbidity such that any adverse effects will be confined to an acceptably small envelope of ocean and seabed.
However there are clear indications in the report that there are uncertainties related to the desk-top exercise which reached these conclusions and that careful monitoring of the effects of the outfall needs to be on-going and may determine the need for modification of the design of the diffusing system at the outfall.
The Board requests that the conditions for consent should require monitoring of the diffusion effects as well as considering alternative designs for the diffusion equipment which would cope with dilution difficulties which are feasible but not predicted in the computer modelling. (The Board notes that a Marine Outflow Management Plan will include the method of diffusion and dilution and also notes that further detail about this from HDL is required.)

Summary

The Board supports this proposal. It considers that there are considerable benefits from this hydro-electric scheme, including a significant generation of power and a long term management of an ongoing environmental issue --historic acid mine drainage--- with relatively minor adverse effects.

(Clearly an important issue is whether or not the adverse effects can be considered as minor.

It is interesting to see that the agreed positive effects can not be used in influencing this decision. The conditions required of the applicant still require further information from HDL --information to be provided in the course of this hearing. However the Board does not recognise in these requirements any barrier of an unsurmountable nature Accordingly the Board continues to support the HDL application.)