



TO THE West Coast Regional Council
AND THE Buller District Council

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of all resource consent applications by
Hydro Developments Limited for
Stockton Plateau Hydro Project...

SUBMISSION ON BEHALF OF
THE ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND
INCORPORATED
30 January 2009

Introduction

1. The Royal Forest and Bird Protection Society (“Forest and Bird” or “the Society”) has campaigned for 85 years for the protection of New Zealand’s native species and the habitats on which they depend. Around 38,000 New Zealanders in 55 branches nationwide belong to Forest and Bird, supporting the Society’s objectives of secure protection for native species, ecosystems and landforms.

2. The constitutional purpose of Forest and Bird is to:

“Take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and natural features of New Zealand, for the benefit of the public including future generations”

3. Decades of coal mining on the Stockton Plateau, and especially the large-scale open-cast mining at the end of the 20th century, has left it as one of the most significant single polluted sites in New Zealand. Until recently the Ngakawau River was regarded as an ‘industrial river’ by Solid Energy New Zealand (“SENZ”), the State coal miner.

4. Water management at Stockton is currently very poor, despite a significant investment by SENZ in water treatment.

5. The hydro-electric generation scheme at Stockton Plateau (“Stockton Hydro”) proposed by Hydro Developments Ltd (“HDL”) is unusual for a hydro scheme in that it has the potential to have a benefit on its immediate environment, by taking polluted water from the Stockton Plateau and passing out to the sea off Granity, generating a significant amount of electricity in the process.

6. While the scheme would have the benefit of removing acid mine drainage (“AMD”) from some of the tributaries of the Ngakawau River, it also has significant impacts and risks.

7. The receiving environment, namely the coastal and marine area, is a sensitive environment which is home to Hector’s Dolphin and other valued species. It is not acceptable for polluted water to be discharged into this environment – the water must be clean before it enters the hydro scheme and is discharged to sea.

Benefits of the scheme

8. Removal of the majority of the AMD presently flowing into the Ngakawau River is the only direct benefit of the scheme. To maximise this benefit it is critical that all possible AMD be directed into the scheme and brought up to an acceptable standard before discharge.

9. An indirect benefit of the scheme will be to reduce pressure to generate electricity from other rivers which have high biodiversity, recreation, landscape and other values.

Impacts of the scheme

10. Forest and Bird has concerns about a number of the impacts of the scheme. These include, but are not limited to:

- Discharge of polluted water into the coastal and marine environment and the potential effects of that on the Hector’s dolphin and other marine organisms.
- Reduced water flow in the Ngakawau River and its tributaries
- Inundation of reservoir areas

- Public access lost through the loss of the project footprint from the conservation estate. The loss of access on the Stockton to TinTown (Darlington) Track is of particular concern.
- Impact on historic sites
- Loss of terrestrial flora and fauna
- Loss of landscape values
- Cultural impacts

Risks

11. At present Stockton open-cast mine operates with archaic water rights which impose no water quality limits on discharge. A risk of the scheme is that it might promote poorer-quality water management at Stockton. A key requirement of the scheme would be that it would impose water quality limits on the water discharged to the ocean outfall at Granity and any spilled water down the existing watercourses.
12. There are uncertainties associated with the impact of the discharge of AMD, even when treated and diluted, on the marine and coastal environment. These uncertainties need to be properly researched and managed to ensure that the potential significant adverse impacts on the receiving environment do not occur.

Conclusion

13. Forest and Bird has tried to weigh up the impacts and risks on different parts of the environment. The Society would normally consider such a large reduction of flow in the Ngakawau and its tributaries to be unacceptable. However the Society supports the goal of removing AMD from the Ngakawau River and submits that its removal is a net benefit of the scheme.
14. Other impacts of the scheme also need to be carefully assessed, with stringent conditions placed on consents to ensure that such impacts are less than minor.
15. Forest and Bird is particularly concerned about the potential impacts of discharged water on marine ecosystems.
16. The proposed scheme should go a long way towards meeting the West Coast's energy needs, thereby reducing the demand for hydro schemes on other West Coast rivers.
17. Forest and Bird therefore lends its conditional support to the Stockton Hydro scheme.
18. Forest and Bird would like to be heard in support of this submission.

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