

**PROPOSED STOCKTON PLATEAU HYDRO
PROJECT**

Technical Assessment of Historic Heritage



*West Coast Regional Council
Buller District Council*

Proposed Stockton Plateau Hydro Project

Technical Assessment of Historic Heritage

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1 Introduction

This document presents a summary of the key issues relating to historic heritage for the proposed Stockton Plateau Hydro Project (SPHP). This assessment has been based on the applicant's "Assessment of Environmental Effects" dated November 2008, together with the subsequent responses by the applicant to the section 92 requests for further information and their submitted draft consent conditions.

1.1 Qualifications

My name is Cathryn Elizabeth Barr. I have been employed by Opus International Consultants Ltd as Senior Archaeologist since 2004. I hold a Master of Arts (Honours) degree in Anthropology, specialising in archaeology, from the University of Auckland and a Master of Cultural Heritage degree through Deakin University, Australia. I have 20 years professional experience as an archaeologist in New Zealand. I specialise in heritage assessment and heritage site management.

1.2 Scope of Report

To carry out this review of the consent application I have considered the relevant sections of the AEE submitted by HDL and the following technical appendices:

- Appendix A Stockton Plateau Hydro Project: An assessment of the effects on Archaeological Values, prepared by Katharine Watson

In addition I carried out a site visit on 19th February 2009 and had discussions with the applicant's team to further inform me on the application. Further information was provided by the applicant in response to a Section 92 request for further information.

1.3 Assessment of Effects – Matters Agreed

The Stockton Plateau is a highly modified environment, with evidence of current and historic coal mining across the area dating from late nineteenth to late twentieth century. This continuous use has the potential to present a landscape with evidence of the development of an industry over time. The creation of two storage reservoirs and associated tunnels and infrastructure for the generation of power will result in additional physical impact on this cultural environment. Several of the mitigation measures proposed by HDL have the potential to provide opportunity to record the remnants of mining on the plateau and to provide access to areas of historic interest to the public.

1.4 Assessment of Effects - Outstanding Issues

The following key technical issues have been considered in terms of adverse effects:

- Modification of a section of the Electric Loco Line
- Proposed Mitigation
- Potential impact on additional heritage features

2 Issue 1 - Modification of a section of Electric Loco Line

2.1 Significance

The archaeological consultant employed by HDL concluded that the section of electric loco line within the immediate vicinity of the proposed Weka Dam is of national significance. This section of the electric loco line is significant in that it was the first electric loco line to be constructed in New Zealand, and this section of the line contains features not evident elsewhere on the line, including a siding and a points mechanism.

Statements made by HDL have indicated that plans cannot be amended to avoid flooding this section of the electric loco line, and that “the effects are minor, not major as stated”. The project will destroy 3% of the formation of the electric loco line and will inundate 10% of the formation. The section of the line impacted however is also that section identified by HDL’s consultant as being of national significance.

No clear statement is made by an appropriately qualified heritage specialist as to the impact of inundation or loss of parts of the oldest section of the electric loco line and it is not clear on what heritage basis the effects on a feature identified as having national heritage values, have been determined to be minor.

Recommendation: This matter requires further consideration by HDL at the hearing, and further information should be presented that provides a statement from a suitably qualified heritage specialist.

Presentation of this information will provide appropriate guidance for decision making under the provisions of the West Coast Regional Policy Statement (matters to be considered when assessing heritage places or sites Policy 6.1) and the Buller District Plan (Policy 4.6.8.2).

3 Issue 2 - Proposed Mitigation

3.1 Proposed Walking Track development

In respect to mitigation for the adverse effect on the electric loco line, HDL have proposed recording of features, the collection of any portable artefacts within the impact areas and the preparation of these for public display. In addition it is proposed that, with the co-operation of the Department of Conservation (DoC) and Solid Energy New Zealand (SENZ), a walking track from the Weka Reservoir to Mt William is developed, following a section of the loco line. Clearance of vegetation and maintenance of a walking track are suggested, but there is no clear indication as to which organisation will be responsible for this work.

No evidence is presented by HDL in regard to any formal commitment by other parties (SENZ or DoC) to the development of a walking track linking Weka Reservoir to the Mt William reservoir. It is difficult to consider how successful this mitigation proposal would be as it is dependant on third parties who are not subject to this consenting process. Without

evidence of formal commitment to the development of a walking track, associated interpretation and display of historic materials, the offer of such as a form of mitigation cannot be considered.

Recommendation That evidence of a formal agreement / commitment between HDL, SENZ and the DoC is presented at the hearing to confirm the offer of mitigation is genuine and is acceptable to all parties.

3.2 Operation of Accidental Discovery Protocol / Site Recording

HDL have indicated that all operations associated with the project will operate under an Accidental Discovery Protocol (ADP) to ensure that any historic artefacts that are uncovered in the process of construction can be salvaged. The use of an ADP is appropriate in areas where it is not possible to identify all features or items prior to construction work commencing. It is noted however that the archaeological report commissioned as part of this project focussed on four known areas of historic interest, and as such there remain several areas within the project area where evidence of historic mining (up to the 1960s) remains, and which has not been surveyed and recorded by an archaeologist. While these features do not meet the definition of an archaeological site under the provisions of the Historic Places Act 1993, they are considered evidence of historic activities in this landscape, and form part of the history of the West Coast.

Operating an ADP will allow items noticed in the course of work to be recorded and collected if appropriate. This is a technique however that may result in the unintentional loss of items or features, if they are not recognised by contractors. This is particularly the case where features may be associated with the heritage mining activities on the Stockton Plateau, but may not necessarily be “old”.

Survey and recording of all work areas by a suitably qualified heritage professional will allow a record to be developed of all past mining and associated residential activities on the Stockton Plateau. Although features located in the project area may be associated with later periods of mining operations (1960s) they form part of the overall historic use of this landscape, and will be affected by the proposed development. In this instance systematic recording of items and features to develop an overall picture of land use is considered more appropriate than accidental recording.

Recommendation: It is recommended that as a condition of any consent granted to HDL for the development of the Stockton Hydro Project, that conditions are included that require the survey and recording of all historic mining features within areas or earthworks, dam construction and inundation.

3.3 Proposed Land Exchange

It has been identified that HDL are proposing a land swap with the DoC. Information available indicates that the land being considered offsets terrestrial ecology effects of the proposal. As is noted above, the HDL proposal has the potential to have significant adverse effects on the historic heritage values of the Stockton Plateau, particularly the historic mining cultural landscape. No evidence is provided in the application as to the

historic heritage values of the land proposed for exchange, yet HDL have suggested that the land swap could form part of the mitigation package for the loss of historic heritage as a result of the project. Without an assessment or the inclusion of historic heritage as part of the land swap, it is questioned whether the land swap can be considered as part of the historic heritage mitigation package.

It is also noted that the applicants consider that the only loss of historic heritage associated with the project is the loss of a section of the electric loco line. This fails to recognise later historic evidence on the plateau, and how this links with the overall development of mining up to the 1960s, discussed elsewhere.

Recommendation: That further information should be presented that provides a statement from a suitably qualified heritage specialist on the historic heritage values of any land proposed for exchange as part of any mitigation package.

4 Issue 3 - Potential impact on additional heritage features

As is noted above, statements provided by HDL suggest that the only historic heritage feature to be adversely impacted by the proposal resulting in a loss of heritage value is the electric loco formation. Only four areas were surveyed by the consultant archaeologist as areas with potential to contain archaeological remains, and there is potential for further evidence of structures and features of historic interest within the project area.

More detail archaeological surveying of areas to be impacted by the proposal will allow development of a record of heritage features and sites associated with mining on the Stockton Plateau.

No assessment of potential impact on historic buildings in Granity was carried out as part of the assessment of impact on historic heritage, however subsequent information provided by HDL has indicated that monitoring of these buildings / structure is proposed. It is recommended that a base line inspection of the condition of the structures (Granity Library; War Memorial and State Mine Store (Museum) including the historic kilns) is carried out by an appropriate heritage buildings specialist. Monitoring of building throughout construction and at the completion of works will allow for an accurate assessment of the impacts of construction and blasting on these registered historic structures.

Recommendation: That a condition of any consent granted for this project should include the establishment of condition monitoring of historic buildings (Granity Library; War Memorial and State Mine Store (Museum) including the historic kilns) within Granity by an appropriately qualified heritage specialist.

The inclusion of this condition in any consent granted will ensure that objective 4.6.7.1 of the Buller District Plan and Policy 6.1 of the West Coast Regional Policy Statement have been adequately considered.

5 Summary

As part of the assessment of effects provided with the application, HDL included an assessment of archaeological values within the Stockton Plateau Hydro Project area. This assessment identified several key areas with archaeological values, and a feature considered to be of national historic significance – part of the first Electric Loco line constructed in New Zealand. HDL have failed to provide a clear statement by a technical specialist on how the nationally significant values of the loco line will be affected by their proposal, making consideration of this difficult. Response to S92 requests has indicated a focus on pre-1900 sites (archaeological sites as defined by Historic Places Act 1993) but failed to adequately recognise and assess the Stockton Plateau as a heritage landscape with evidence of historic activities dating from the 1890s to 1960s. Assessment of the whole plateau as a landscape with evidence of coal mining history would be consistent with the objectives and policies of both the West Coast Regional Policy Statement and the Buller District Plan.

Several proposals have been put forward in order to mitigate loss of historic heritage as a result of the proposal. Much of the mitigation proposed however is dependant on other parties support, and without formal documentation indicating this support, it is considered that these proposals cannot be considered adequate mitigation.

Recommendations are provided that would provide adequate conditions for the recording of historic features on the Stockton Plateau before they are lost as a result of the development, and monitoring of impacts on structures that may be indirectly impacted by the development. Assuming that the recommendations are adopted, it is felt that loss of heritage values can be mitigated. A final statement on this however can only be made when a statement from a suitably qualified heritage specialist is provided on the impact of the project on a feature described as being of national significance – the electric loco line.

6 References

Watson, K 2008 Stockton Plateau Hydro Project: an assessment of the effects on archaeological values unpublished report for Hydro Developments Ltd.