



Pauline Adams West Coast CO

From:
Sent:
To: Friday, 16 September 2016 9:57 a.m.
Permissions Hokitika

Follow Up Flag:
Flag Status: Follow up
Flagged

I OBJECT TO THE WAITAHA RIVER BEING DAMMED

there are precious species such as rare native snails live there and if we dam the river it will ruin the ecosystem surrounding it!!!!

Kind regards

2

Pauline Adams West Coast CO

From: Friday, 16 September 2016 1:21 p.m.
Sent: Permissions Hokitika
To: Pauline Adams
Subject: FAO: Pauline Adams - Objection to proposed run of the river power scheme on the Waitaha river

Dear Pauline,

I am writing to you to object to the proposed hydro power scheme on the Waitaha river near to Hokitika. As an avid kayaker i have had the pleasure of paddling the Waitaha and i can tell you that it is one of the most scenic and beautiful wilderness trips anywhere in the world with some unique wildlife, flora and geology, not to mention world class whitewater. Allowing this hydro scheme will destroy that beauty and wilderness for very little reward.

In common with most west coast rivers, the level of the Waitaha fluctuates wildly with rain and for most of the year there is insufficient water in the river to generate meaningful amounts of electricity. What will be supplied is already surplus to requirements for the area and is at such a distance from the main town of Hokitika that connecting it to the grid network will lose most of the power generated. This project is simply proposed as a means to generate work for the development company and once constructed will hardly provide employment for anyone. I urge you to consider the needs of the environment and the people who enjoy it before the interests of outside developers. Please deny permission to this project.

Yours sincerely

3

Pauline Adams West Coast CO

From:
Sent: Friday, 16 September 2016 7:15 p.m.
To: Permissions Hokitika
Subject: Waitaha River

Follow Up Flag:
Flag Status: Follow up
Flagged

dear Sir/Madam;

Its with a heavy heart I have learned that you wish to dam the Waitaha River. I think this is a mistake based on probably based some flawed idea that this is some how going to be green energy or some sort of renewable resource. I traveled to New Zealand from Europe(Tirol) in 2011 with the expressed purpose of paddling the rivers of the West Coast. Out of a 6 week trip 4 was spent on the west coast exploring rivers and having fun. I also volunteered some of my holiday time to help with a SAR. Friends of mine traveled there the next 2 years for the same purpose and some had already been in the 3 years before. While we are a small group and I'm sure you think there is a lot of rivers, the Waitaha River will be missed for its quality whitewater and scenery. Please reconsider this decision.

Pauline Adams West Coast CO

From:
Sent: Friday, 16 September 2016 7:38
To: p.m. Permissions Hokitika
Subject: Waitaha hydro scheme

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Dear sir

I strongly object to the intention to grant a lease, licence and easement concession for a term of 49 years under section 17Q of the Conservation Act 1987 to Westpower Limited to construct and operate a run of the river hydro scheme on the Waitaha River on the West Coast.

This area is irreplaceable in terms of it's conservation. It is Taonga for all Kiwis present and future, and should not be used for the short term benefit of a few

Yours Sincerely

5

Pauline Adams West Coast CO

From:
Sent: Saturday, 17 September 2016 9:15 a.m.
To: Permissions Hokitika
Subject: Submission on Waitaha River, attn Pauline Adams
Attachments: waitaha submission.rtf

Waitaha Valley: Objection to Hydro Development Concession, 16.9.2016

I wish to be heard in regard to my submission

I oppose any development on the Waitaha River. I am a local businessman and tourist guide as well as a keen trumper and member of Search and Rescue. I have been familiar with the Waitaha Valley since 1989. I have run logistics for remote building in Kahurangi National Park. I have also been a Westpower consumer for 23 years.

WILDERNESS VALUES

This whole valley catchment is a natural wilderness area. Water quality is very pure. It should be preserved as a blue duck stronghold. The river contains unparalleled gorge waterfalls which are a treasure of the nation. There are kiwis at Kiwi Flat and large numbers of rare birds throughout. There are natural rock hot pools within the proposed scheme. The Upper Waitaha was the last place in NZ to be mapped by Charlie Douglas in the 1890s, he described the Windhover Gorge as NZ's most beautiful waterfall and he should know, having visited and drawn most of the West Coast's main waterfalls. Kayakers and trampers love this valley for its wilderness values which would be ruined by any hydro scheme. Kiwi Flat is an amazingly beautiful natural valley with virtually no visible sign of humans bar one hut and walking bridge. The whole valley should be in the South Westland World Heritage Park and totally protected for all time from dams and mining, activities which threaten its integrity and could ruin it for ever. There are not many clean wild rivers left in the world which run from source to sea unimpeded: the Waitaha River is one of them.

DANGER

This river rises up to 60 feet in an hour. I have personally seen it rise and fall in the Morgan Gorge like a flash flood. It cannot be contained by a weir. People will drown: builders will drown. Plant will be lost in floods during construction. The whole idea is so misconceived. No words can exaggerate the rapid rise of this high rainfall catchment in spring snow melt, and in flash floods at any time of year.

The proposed route of the tunnel passes many underground watercourses, making it much harder to engineer than you think. Underground problems would include hot springs, underground cave systems, gigantic loose boulders,

underground rivers. There is no road access to Kiwi flat. Logistically expenses will blow out way beyond prediction.

The proposed tunnel crosses the Alpine earthquake fault, a very active area of the alpine fault plate boundary. It would be insane to build anything on it let alone a structure crossing the faultline. I have personally experienced big tremors in the area which occur regularly. The Morgan Gorge is too geologically unstable to support the scheme in practical terms.

COMPANY HISTORY UNRELIABLE

The company has already shown they can't clean up after them. Recent surveys spray painted rocks along the river contrary to specific conditions set by DOC. This left clearly visible orange paint contrary to their express conditions to leave no trace, and they initially did not clean it up when requested. This is all documented by DOC in Hokitika and was witnessed by

locals. How much of a worse mess would they make vandalising the area with machinery? Why is DOC supporting this scheme when they should be advocating on the public's behalf for protection of this river.

LOCAL POWER? YEAH RIGHT

There is a deep irony in claims that a reliable power source will create secure local supply. We recall the politics of power trusts on the West Coast: once locally owned west coast hydro schemes were forcibly sold into private ownership. They were snapped up by north island companies who continue to drain them for profit. This scheme will not as promised provide cheap local power but the exact opposite: to exploit local rainfall, export the power, and resell power back to locals at vastly increased market rates. We are sick of being charged line rentals and GST for power schemes once owned by the people of Westland as a Community Trust. The electric power supply structure is a ripoff. Westpower should focus on regaining its integrity by the political process rather than pretending to secure local power supply by kowtowing to other power companies and their greed. This scheme is not needed and nor is the power. It is a fantasy of pure exploitative greed, using a common good for profit.

I oppose this concession and would like to be heard in regard to my submission.

6

Pauline Adams West Coast CO

From:
Sent: Saturday, 17 September 2016 12:30
To: p.m. Permissions Hokitika
Subject: waitaha river hydro

I am strongly opposed to any hydro electric development on the Waitaha River.
regards

Pauline Adams West Coast CO

From: Saturday, 17 September 2016 2:27 p.m.
Sent: Permissions Hokitika
To: Waitaha
Subject:

Hi,

Please refuse approval of the dewatering of Morgan Gorge in the Waitaha.

This river is completely wild and would have a high conservation grade if this area had been graded, easily grade 4 with Morgan Gorge going above that in my opinion. If this river had been conservation graded, as was meant to have happened within three years of DoCs formation, it would now have protection from this application. You need to look at the conservation value this Gorge should have and factor that into your decision, better still grade it now, but don't ignore it.

Morgan Gorge is the most magnificent example of a confined gorge that I have seen. The view from the upstream wire bridge of the Gorge beginnings is inspiring.

Dewatering it would destroy a unique feature and would considerably reduce its visual impact.

Weatpower must be able to find a West Coast water source in a less impressive landscape. This one is too precious to lose.

Please refuse the application to dewater Morgan Gorge

Cheers,

Pauline Adams West Coast CO

From:
Sent: Saturday, 17 September 2016 3:12 p.m.
To: Permissions Hokitika
Cc: maggie.barry@parliament.govt.nz
Subject: Waitaha River Concession

Hello Pauline,

The proposal to allow Westpower Limited a lease, concession or easement to the Waitaha River is one that transcends the value of money or electricity that this venture might produce. What New Zealand has and it is shrinking year by year is unique, undisturbed, natural landscapes that form the very basis of our unique selling point of 1/3 of our national GDP (tourism). Once gone these landscapes of unique beauty can never be returned, not to mention the role they serve both the upstream and downstream ecosystem. The world is fast losing these landscapes which support the fundamental ecosystem of our planet, these are the places that as humans and New Zealanders we turn to for sanctuary to escape the madness of the modern world. As time moves forward protecting and restoring New Zealand's landscapes, environment, flora & fauna will increase in value exponentially directly in correlation with the reduction of these sorts of landscapes, pristine environment and access to them in the other parts of the world.

New Zealand's wild regions are our key to future value for all New Zealanders, it is both these landscapes and the fact that they exist that gives tourists the very notion to come to New Zealand and drop some dollars off on while they are here. Every little bit counts, the further these places are eroded the less attractive NZ is to travellers.

This all goes without mentioning the value NZers place on these places. Just because a certain place does not receive a lot of foot traffic does not mean it is not valuable and worth protecting, it increases its value, it does not diminish it.

Perhaps energy and money would be best spent improving the efficiency of the existing major hydro dams East of the divide, this is where the most bang for buck is to be had for the whole country, these dams are already in place and the landscape and downstream river system have already been lost forever, so placing emphasis on having these upgraded for greater efficiency surely has to be a priority over a minor inefficient power provider wanting to destroy NZ's unique landscapes and immutable value on the West Coast?

Regards,

9

Pauline Adams West Coast CO

From:
Sent: Saturday, 17 September 2016 4:08 p.m.
To: Permissions Hokitika
Cc:
Subject: West power application for concession

Application:

WC-34113-OTH

I absolutely and without compromise oppose the intention of the Minister to issue permissions (license, lease and concessions) for the power station and all associated services and structures on the Waitaha river.

Morgans Gorge and the surrounding areas are a perfect and pristine example of a WILD river and gorge that has unique wild, natural and sculptural qualities.

The presence of large cement intakes and associated roading and structures combine with the loss of natural water flow regime will completely and unmitigatedly compromise the wild and natural qualities of the location.

If the minister has not already they must stand on the site and location picture the change of character that will eventuate from the proposal with no meaningful environmental outcome or meaningful mitigation of effects.

Regards

10

Pauline Adams West Coast CO

From: Sunday, 18 September 2016 2:06 p.m.
Sent: Permissions Hokitika
To: ATTN: Pauline Adams - Submission to the Waitaha run of river proposal
Subject:

Hi

The proposed run-of-river hydro scheme for the Waitaha river is not something that should be considered. It will irreversibly change the pristine area of South Island land that is a more valuable asset to New Zealand in its current state. New Zealand relies on its image for tourism and export and continuing with projects such as these threatens not only the ecosystem but also the tourists and foreign trade that we rely on.

To continue with this project would be very short sighted and I could no longer support any government that pushes this through.

Thank you for your attention.



Pauline Adams West Coast CO

From:
Sent: Monday, 19 September 2016 7:31 a.m.
To: Permissions Hokitika
Subject: Proposed river run

I would like to register my opposition to this proposal. We are running out of magnificent places to roam in this country and from what I understand, it's not an essential plan. Please let us keep our beautiful places intact; back off Maggie Barry Susan Kerridge Northland Sent from my iPad

September 18th, 2016

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

To the Director General of the New Zealand Department of Conservation:

I am writing to address the issue of the Department of Conservation granting a concession to Westpower Limited to build a hydro-electric power scheme in the Waitaha Valley. To get a better feel for my objections, I would like to give you some information about myself. I was born and grew up in the United States. When I was twelve years old (in 2009), my family moved to Nelson. My love of the outdoors was born there, and I also developed a love for the beautiful and ceaselessly amazing country of New Zealand. I now have Permanent Residency, visit regularly, and plan to move back to live permanently when I have graduated university. On these visits to New Zealand, I focus most of my time exploring the backcountry. I am a huge proponent of DOC's hut system, and know how lucky NZ is to have such an extensive network of remote facilities. I hope to visit all of New Zealand's huts in my lifetime.

The Waitaha Valley is probably one of the best examples of what I love about the New Zealand backcountry. The valley itself is reputed as one of the most rugged and requires extreme care to traverse safely. Upstream, there are a few valley turnoffs (Scamper Torrent and County) where other tributaries can be explored, and where one can spend the night in absolute solitude. And at its head, we find a hut rich with history and sitting in one of the most amazing hut sites in the country. Ivory Lake Hut was built for glacier studies by the NZFS for the Ministry of Works, and is full of relics from days gone by. Thanks to a combination of its remoteness, uniqueness, and location, Ivory Lake has built up a reputation as the holy grail of NZ huts. Thanks to this reputation, it was recently profiled in Backpacker Magazine, a huge outdoors publication here in the United States, and referred to as "The Best Backcountry Hut in the World" by author Rachel Zurer. Ms Zurer settled on tramping to this hut after speaking to various prominent members of the outdoor community, all of whom said Ivory Lake was the pinnacle of New Zealand tramping.

I want you to consider for a moment a situation that might arise in the event that the Westpower concession were granted. An experienced couple from the United States decides to visit New Zealand on their honeymoon, and after reading the article in Backpacker Magazine, set their sights on Ivory Lake. They do training hikes in New Zealand, research and practice river crossings, and are well prepared to take on the epic Waitaha. The day comes to depart, and they head to the trailhead. But when they spot the now-familiar green-and-yellow DOC sign telling them their first hut (Kiwi Flat) is an estimated 3-4 hours away, they are surprised to find a wide gravel road instead of a rugged track. They warily begin walking up the road, hoping to

September 18th, 2016

see the start of the track nearby. A rumble ahead has them stepping to the side of the road as an industrial dump truck rounds the bend ahead. They wave down the driver to ask if they are in the right place, and he tells them that the track begins about 2 hours up the road. They ask why there are dump trucks on this road, and the driver, realizing that they are tourists, quickly fills them in on the new hydro project being built on the Waitaha. With a cheery smile and a "catch ya!" he drives off in a cloud of dust, leaving the couple coughing and wondering if they made the wrong choice coming to the Waitaha.

Here is the real tragedy of that situation: Ivory Lake Hut will not be affected by the hydro project, and neither will the ruggedness or wilderness up the upper Waitaha. But the industrial construction and clear evidence of human interference in the lower reaches of the valley will be a major turn off for some people. And its not just international tourism that will be affected: No longer will Kiwi trampers be able to unequivocally say Ivory Lake is the best hut in the world, simply because of the sour taste the first day of travel up the river leaves in your mouth.

Thanks to the work of the amazing group Permolat, lesser travelled tracks and remote huts on the West Coast are now receiving the attention they deserve. I am glad to see DOC working so well with these volunteer groups. Visitor numbers are on the rise, including to the Waitaha valley. But in the end, visitor numbers should not matter. Other countries around the world sell out their natural places to large corporations, but New Zealand has always been known around the world as a place full of landscapes untouched by humans. That reputation needs to remain intact. I ask that you reject the proposal from Westpower, on the grounds that it will damage the recreation value of one of the best tramping valleys in the country, and spoil the the Best Backcountry Hut in the World.

Sincerely,

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Submission on Waitaha River Hydro Scheme

1. There is no great need for further generation electricity on the West Coast as there is a national glut of electricity which is already of concern to major players in the electricity industry.

2. The process of building the scheme will cause destruction of a wild and scenic area. New access roads and transmission lines can cause habitat fragmentation for many species, allowing the introduction of invasive species and increases in undesirable human activities.

3. The scheme will take water out of the river at critical steep positions, the very places that have most recreational value. It will therefore impact a lucrative tourist resource for NZ. Kayak tourism is increasingly important for this part of the West Coast.

Morgan Gorge, which used to be considered un-runnable is now in modern kayaking considered a peak challenge and attracts overseas kayakers to come to the area.

4. Diverting large amounts of water into pipes for the hydro substantially reduces river flows which affects water quality as well as removing a recreational resource. It minimises habitat quality for fish and aquatic organisms; reduced flows can lead to excessively warm water for fish in summer.

5. Using the record of pre-historic Alpine Fault earthquakes from Lake McKerrow, scientists have calculated the probability of a large (M8) earthquake in the next 50 years at 30%. Considering this, the scheme is unlikely to survive for the length of time to assure an economic return for the company. (Ref. GNS Crown Research Institute website.

<http://www.gns.cri.nz/Home/Learning/Science-Topics/Earthquakes/Major-Faults-in-New-Zealand/Alpine-Fault/Alpine-Fault-earthquakes>)

14

Pauline Adams West Coast CO

From:
Sent: Tuesday, 20 September 2016 9:54 a.m.
To: Permissions Hokitika
Subject: FW: Waitaha Hydro Scheme

*Jose Watson
Communications Advisor
Department of Conservation, Hokitika
Western South Island Region
64 3 756 9129*

From:
Sent: Saturday, 17 September 2016 12:41 a.m.
To: Jose Watson <jwatson@doc.govt.nz>
Subject: Waitaha Hydro Scheme

No thanks, do not want this in my backyard.
The impact to the wildlife is permanent.
What independant review is done of the proposal?
It obviously is very bias in Westpower's favour.
Does Doc write an impact analysis?
Thanks,

15

Pauline Adams West Coast CO

From:
Sent: Tuesday, 20 September 2016 7:34
To: p.m. Permissions Hokitika
Subject: stop the Waitaha dam proposal

To Pauline Adams.

Hello my name is I am a kiwi living in the nelson region but plan to call the west coast home very soon. I am an avid tramper, kayaker, adventurer. It gives me great sadness to hear that the proposed dam in the waitaha is getting momentum. We are extremely lucky to live in a country with so much untouched nature. This is something i have experienced deeply as i have done alot of travel in the outdoors around the world, and its hard to be so remote and raw as you can be in new zealands nature. This is why we need to stop this dam. The Morgans gorge is one of our most stunning rugged gorges. It has a hot spring in it which is accessable. It is a popular kayakers run which is unreplacable or beatable in all of new zealand. The Waitaha is one of the most accessable remote valleys we have. The veiws, mountains, rivers are breathtaking.

Please stop this proposal. It makes me sad that we are even considering spoiling this wonder.

Thanks for listening

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

By email to: permissionshokitika@doc.govt.nz

Email also copied to:

Attention: Pauline Adams

Dear Pauline,

Waitaha Power run of the river hydro scheme concession to Westpower Limited

I have been a recreational user of the Waitaha Valley for the last 20 years, with my most recent trip to the area in March 2016.

I am a member of the Federated Mountain Clubs of New Zealand, the New Zealand Alpine Club, and have also undertaken trips to this area with the Otago University Tramping Club in the past.

For approximately the past 15 years there have been ongoing issues around public access across private farmland to Morgan Gorge and the upper Waitaha beyond, with the original track access on the true left in recent years being denied by a private landowner.

Access to the valley has become substantially longer and more difficult since the main track access was moved from the true left bank to the true right bank and it is likely that numbers of people using the valley have subsequently reduced.

The current foot access, confined to a narrow legal 'Queens Chain' corridor along the true right bank, is slow, rough and contrived along the riverbed, with current position of the river and river levels forcing difficult deviations along flagged routes up onto heavily bushed bluffs.

I have attached a picture to this submission showing a tramper using one of the flagged diversions in March 2016 to avoid a dangerous crossing of part of the Waitaha River. This diversion is located on the eastern side of a forested mound (.202) along the true right side of the river approximately 1100m upstream from the present public road end.



The Department of Conservation Concession officers report states the following (reproduced in italics below) on page 106:

Comment

4.587 The desired outcomes for the Backcountry-Remote Zone for the Hokitika Place is discussed later in this report under CMS section 4.2.6.7, refer to this section. The road that is proposed to be formed by Westpower for access into the powerhouse and tunnel portal would not be available generally for use by the public for motor vehicles, bikes or horses etc... as access to this road crosses private land. Foot access only into the site would continue to be available up the riverbed on the true right.

This is an unacceptable outcome for recreational users.

Anyone attempting to access the valley will be continue to be forced to use the rough and relatively slow riverbed and bush bluffs route, and, after some time working their way up the river for approximately 5 kilometres will come across a power station accessed by a road connecting with the lower valley that they are not legally permitted to utilise.

The power station site will very likely become the de facto road end parking area for some upper Waitaha valley recreation users; those who are either family or friends of the private landowner, employees of Westpower, and associated contractors.

It is possible that commercial interests such as guiding experience companies could also gain access to this road, leaving a multiple tier access regime that severely disadvantages the average kiwi hunter, tramper and kayaker.

Notwithstanding the above, these trampers, hunters, kayakers, and other recreational users will likely attempt to simply use the access road with or without legal permission, via vehicle or on foot, leading to future conflict with Westpower and the private landowner, with potential further impositions on public access in the future.

Locating the public road end at the power station site would go some way to ameliorating any negative effects of the proposal on Waitaha recreational users, as it would improve and settle the ongoing public access issue.

Given that the eastern terminus of the 66 kV power line and the access road, as well as the built form of the power station, tunnel portal, and associated infrastructure are all located in one location, it makes logical sense from a landscape perspective to also position the public road end at this location, and removes the 'visual shock' experience of a recreational user coming across a power station in the middle of relative wilderness an hour and more into their tramp.

Any members of the public driving up the proposed access road would follow the road and the 66 kV power line across open farmland before transitioning into the start of the upper valley as the steep bush clad mountains close in around them.

They would then reach the road end at the power station, where the binary lineal forms of the 66 kV power line and access road would terminate. These lineal forms are representative of the lower valley, where the predominant land use is open farmland, with straight fence and vegetation boundaries, interspersed with scattered residences and farm structures.

Leaving a vehicle at the power station and continuing on foot up valley beyond here creates a natural spatial barrier between the built form, civilisation and farmland of the lower valley, and the relatively undisturbed wilderness of the upper valley.

This would be a similar experience to that of the nearby Amethyst Scheme, and also representative of other power station infrastructure around New Zealand.

A foot bridge across the Waitaha could be also located in this vicinity, allowing access to the easier gradient of the older track on the true left bank. This would eliminate the need to re-locate parts of the present track on the north side to avoid the proposed Westpower infrastructure.

Consequently I wish to make the following submission:

Support the Waitaha Scheme concession in general with conditions:

- 1. That permanent legal public vehicle and foot access is negotiated from the current public parking area across the private farm land and up the proposed access road to the power station site;**
- 2. Adequate space is provided at this location for parked vehicles of upper Waitaha valley recreation users;**
- 3. That the power station site is the new public road end and general public entry point for the upper Waitaha track and hut system.**

I do not wish to appear or be heard in respect of the above submission.

Regards,

Pauline Adams West Coast CO

From:
Sent: Wednesday, 28 September 2016 7:58
To: p.m. Permissions Hokitika
Subject: Waitaha hydro project

To Whom It May Concern,

I am writing to state that I am against a hydro project on the Waitaha River. I have walked in to the Morgan Gorge, on the Waitaha River, and the area is remote and unspoiled. Any type of hydro dam will destroy the river and surrounds irrevocably. The removal of bush to get the road to the site, the major construction, and the re-routing of the river flow, in order to generate power for whom? The population in that area of the coast does not seem to warrant the need.

What happened to power generation on the Arnold River? The power company put a lot of time and effort and money in to expanding that scheme, and then abandoned it for some reason.

I think that projects like the Amethyst scheme make a lot of sense, in that it is not destroying a river that is used for other pursuits. It is true that not many people will ever kayak the Waitaha River, but that is not a reason to give the green light to this project. The reason to not give the green light to this project, I believe, is because the benefits do not outweigh the risks/harm. It would also set a precedent. The power companies have been looking at several rivers on the West Coast and I feel that we should not be letting them exploit the natural treasures that are the wild rivers of New Zealand.

Sincerely,

Sent from my iPa

Pauline Adams West Coast CO

From:
Sent: Sunday, 2 October 2016 1:22 p.m.
To: Permissions Hokitika
Subject: Objection to the Waitaha dam proposal

Hello

I am writing this letter to object to the proposal to dam the Waitaha river on the west coast.

I currently work in the central north island around the location of a hydro scheme, I regularly get asked, by students how could people allow the destruction of these beautiful places. This is after they have seen the river from above and below the dam.

So I am asking for the dam NOT to happen so future generations can get the opportunity to experience a beautiful remote valley that the Waitaha is.

Thank you for this

To the Director-General, Department of Conservation

Feedback on the Waitaha Hydro Scheme proposal.

We the undersigned of the strongly object to Westpower's proposal for a run-of-the-river hydro scheme in the Morgan Gorge in Westland's Waitaha River catchment. Moreover, we are concerned and disappointed that DOC has approved in principle, a scheme that will significantly and negatively impact on what is unarguably an outstandingly beautiful, and unmodified natural wilderness feature. DOC has a clearly mandated role to protect such icons for the public and future generations. To make matters worse there appears to be no sound or convincing economic justification for the scheme.

Westpower has publicly minimised the impact of the Waitaha project from the outset by likening it to a smaller and relatively unobtrusive scheme further down the Coast at the Amethyst Ravine. This comparison is disingenuous at best. The Amethyst is a large creek which is fed from the frontal ranges, while the Waitaha is a medium-size, snow and glacial-fed river, and is unmodified, pristine wilderness. The Morgan Gorge is a stunning sculpted-rock feature with azure blue water, overhung by southern rata and tall podocarp forest.

The weir that will be constructed at the top end of the Morgan will channel up to 25cumecs of water down a tunnel beneath the Gorge to a powerhouse on the lower section of River. The proposed residual flow in the Gorge will be a paltry 3.5 cumecs, less than one sixth of its average. A planned road up the North bank of the River to the powerhouse will significantly alter the character of the lower valley. The proposed time span of the project is 3-4 years and construction will create a significant and ongoing disturbance. Materials, workers and heavy equipment would be need to be helicoptered up to the weir site, or brought up the tunnel. Once the scheme is underway, the Gorge will permanently lose most of its power and striking colour derived from the snow and glacial melt in the head of the valley. Kayakers will no longer have this fantastic stretch of grade 5 rapid to play in. The Waitaha's upper catchment is considered to meet the test of an outstanding unaltered natural landscape, and there is no disagreement from any of the parties that the Morgan Gorge is an outstanding natural feature in its own right. In addition to destroying the integrity of this icon, the scheme will greatly compromise the wilderness value of the upper valley.

The economic justifications for the project are extremely unconvincing. Westpower would not sell the electricity produced by the Waitaha scheme to consumers. Rather, it would be sold into the wholesale electricity market, or to one or more electricity retailers. The addition of the Amethyst scheme is expected to cause the equivalent of around 55% of Westpower's output to be exported out of the region. Demand on its network has declined sharply from 2010, while the majority of its growth forecasts since 2003 have been over-optimistic, some wildly so. In short, the rate of market growth has been greatly over-estimated and the rate of decline has been significantly under-estimated. This combined with a transmission upgrade in 2011 has created a significant supply surplus. The rest of New Zealand has also come into a surplus of supply relative to demand, and wholesale electricity prices have become flat. A project on the Arnold River already consented, was canned for this reason. This scheme was in a modified area and would have not had such a profound impact on natural values as the Waitaha scheme. Most of the other new generation projects under development on the Coast

between 2003 and 2012 have been cancelled or deferred indefinitely for economic reasons. A report prepared by consultant for the Minister of Conservation concludes that is unlikely that the proposed Waitaha scheme would be "financially viable in the reasonably foreseeable future."

We have no objection to small-scale, low-impact hydro projects such as Amethyst Ravine, Griffin Creek, or the recently opened Inchbonnie scheme, and Westpower could set a real example and help the Coast become self-sufficient with more of these, or by using other low impact and renewable technologies. We consider the proposed scheme intrusive, destructive and totally unnecessary, and are very disappointed that DOC would even consider it, let alone approve it in principle, particularly after the Mokihinui and Ruataniwha debacles. The Department is at risk of ongoing damage to its credibility as guardian of our wild places with its stance.

is a community organisation actively involved, along with DOC, in the maintenance of the tracks and huts in the Waitaha catchment. We have a keen interest in preserving access to these remote areas for those seeking a more challenging outdoor experience. This type of opportunity is unique and not found anywhere else in the world. We believe there is a much greater and longer-term value in preserving this beautiful River in its current unmodified state.

Yours Sincerely



3rd October 2016

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams

Dear Pauline,

I oppose the proposal to construct a run of river hydroelectric power scheme on the Waitaha River and wish to be heard in support of my objections.

In general, I am supportive of hydroelectric power generation, since this activity can be done with very little environmental harm and is clearly a much more sensible technique than burning fossil fuels. However, this proposal would cause significant environmental harm.

If constructed, the hydroelectric power scheme would irreversibly damage an otherwise pristine natural environment that has local, regional and international significance. Importantly, this activity could easily be carried out in another location with far lesser environmental impacts. For example, the Arnold B and Stockton hydropower schemes are proposed for rivers, which have already been heavily modified, and do not hold the same outstanding natural values as the Waitaha.

The site of the proposed outtake structure is a striking example of a West Coast gorge entrance. Visitors to Kiwi Flat, whether they are trampers, hunters, climbers, kayakers, wildlife enthusiasts, hot spring soakers or wilderness travellers all experience the importance that this area of outstanding natural beauty has for New Zealand. The Hokitika Gorge is one of the Region's top tourist attractions and exemplifies the reasons why so many people choose to visit the West Coast and New Zealand in general. Admittedly, the Morgan Gorge experiences far fewer visitors than the Hokitika Gorge, but the value of the place is equal and in time may even be a more significant asset to New Zealand.

Currently, white-water kayakers revere the Waitaha River as a pinnacle of the sport in New Zealand; not just for the technical difficulty in descending the river, but for it's stunning natural beauty and the uniqueness of the opportunities that this river provides. The Morgan Gorge section of the river is a test-piece, which holds a special allure for kayakers of all backgrounds. It is comparable to Aoraki

for alpine climbers. The proposed dewatering of the Morgan Gorge would make this section of river un-navigable. More importantly, it would destroy the natural beauty of the area for all people who visit the gorge.

The Morgan Gorge is a spectacular and dominating steep sided schist gorge separating the front country from the backcountry on the Waitaha River. It is an outstanding natural feature in an outstanding natural landscape, and therefore a very 'special' piece of DoC stewardship land, worthy of preservation and protection by the Department of Conservation for the benefit of all New Zealand, now and for future generations.

Additionally, there is no evidence to suggest that the demand for the power exists or is likely to exist in the foreseeable future. For DoC to consider approval of this degree of environmental harm in an area that has been identified as an outstanding natural feature, there should be no doubt that it is absolutely required and that there are no alternatives. In this case, it has not been demonstrated that it is required and if the demand for power does exist in the future there are proven alternative locations for power generation that do not hold such significant natural values.

The Morgan Gorge is part of New Zealand's unique legacy. Enjoy it. Enrich it. Pass it on.

Sincerely,

Pauline Adams West Coast CO

From:
Sent: Tuesday, 4 October 2016 8:51 a.m.
To: Permissions Hokitika
Subject: Attn: Pauline Adams

Good-morning,
Please submit my vote against the Waitaha river hydro scheme.
Its a beautiful area an i believe it should be left as is so the next few generations can enjoy it as we do today.

Kind regards

Get [Outlook for iOS](#)

Pauline Adams West Coast CO

From:
Sent: Wednesday, 5 October 2016 4:34 p.m.
To: Permissions Hokitika

Dear Pauline Adams

I am writing to you to object against the construction and operation of the river hydro scheme on the Waitaha River on the West Coast.

Yours sincerely

Pauline Adams West Coast CO

From:
Sent: Sunday, 9 October 2016 11:57 a.m.
To: Permissions Hokitika
Subject: Opposing the dam

Hello

I object to the hydro scheme in the Waitaha river on the West Coast. Any disturbance within an ecology so secluded in the South Island will have a major impact on the terrestrial, aquatic and invertebrate life. Whether it be done with the most applied works for making sure environmental impact is minimal. This dam will cause a ripple effect down stream, less nutrients and available food sources for the life around the river will be depleted as a result. Thus biodiversity will decrease. If you are wanting to provide lots of energy to the people in the south-west of the South island, I recommend alternative forms of renewable energy manufacturing.

Thank you

Paul re Adams West Coast CO

From:
Sent: Sunday, 9 October 2016 4:55 p.m.
To: Permissions Hokitika
Subject: Opposing the Waitaha Hydro Scheme

Hi Pauline Adams,

I am writing in opposition of the Waitaha Hydro Scheme. This particular wilderness area is pretty special and I know a lot of people who really connect with this place. I live in an area where there are plenty of dams and it has a significant detrimental effect on the natural environment.

There are other ways to have renewable resources without tainting what good natural places we have left in this country. Lets keep our wild places and treasure our wildlife for future generations. Our land looks after us, so lets do our best to make sure we look after it.

It is with a heartfelt plea that I ask for this hydroscheme to not go ahead.

Kind regards,

RECEIVED

OFFICE OF THE MAYOR

05 October 2016

10 OCT 2016

DEPT OF CONSERVATION

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Di Teuchi (25)
FYA
lll 10/10

Dear Sir,

RE: PROPOSED WAITAHA HYDRO SCHEME

I gladly write in strong support of the granting of concessions for the proposed Waitaha Hydro Scheme.

I have recently seen a presentation on the project and the three things that impressed me most are:

No damming of the river is involved. This means that no land areas will be submerged and therefore that its "ecological footprint" will be negligible.

Westpower Limited's willingness to "share" the river with other users. The Company's decision to locate the proposed diversion tunnel at the bottom end of Kiwi Flat rather than the top in spite of obvious engineering benefits of doing so at the top together with its willingness to close off the diversion channel on certain days as a means to accommodate especially kayakers show that it is acutely aware of the needs of other river users and that it is prepared to make sacrifices in order to accommodate the other users. The Company and its subsidiaries have established an enviable record as a socially and environmentally responsible commercial entity and they clearly are attuned to the needs of other river users in this.

The brilliant simplicity of the scheme. The technology and planning involved are cutting edge and a credit to our Region.

The economic benefits of the scheme to the West Coast and its people should not be under-estimated. I would be most disappointed if the interests of other river users who may oppose the concessions as a matter of principle rather than based on actual detriment, will be allowed to prevent this project from going ahead. You have a Company involved that is clearly willing to consider such other interests and to make reasonable sacrifices.

Kind regards

Heart of the West Coast

Lucy Croft

From:
Sent: Thursday, 13 October 2016 10:35 p.m.
To: Permissions Hokitika
Subject: Waitaha hydro dam proposal

I am writing to oppose the idea of a hydro dam in the Waitaha river catchment. This river and its spectacular gorges need to be preserved in their natural state, for their intrinsic beauty and wildness. Such places should never be allowed to be destroyed for the sake of power generation, or any other commercial development.

Places like this are what New Zealand's tourism image are based on, building a dam in such a site would further tarnish the clean green facade that supports the tourism industry.

Do not grant consent for this blot on our landscape.

Lucy Croft

From:
Sent: Friday, 14 October 2016 1:32 p.m.
To: Permissions Hokitika
Subject: Waitaha hydro proposal

Dear Sir / Madam

I strongly object to the hydro proposal on the Waitaha River.

I don't know how to write an argument but here is how I feel.
My objections are not argued in terms of science or economics.

My basic argument against the proposal is that it is not consistent with DoC's mandate of back country remote management. My legal argument is based on section 25 of the Conservation Act and pursuant to section 17U (3) and 17U(2)(b) of the Conservation Act in saying that conservation values can never be adequately protected by a project or mitigation attempts like this.

Walking into the Waitaha is a special experience. The Morgan Gorge is a passage way and escape into fantastic wild West Coast tramping and mountaineering country. Walking up the gorge past the generation plant, roading, the inlet structures and other constructions evokes no feeling of escape. Surging white water in the gorge furrowing through beautiful rock formations amazes. A trickle of water or timed flushes are a travesty and a joke. There would be no sense of isolation having passed an industrial site.

DoC seem to be increasingly losing the plot. Their job is supposed to be managing the lands allocated to their control in terms of conserving the flora and fauna of natural New Zealand. Further, if practical they should be encouraging recreation within their estate. They have not been allocated these lands to look after for business development and should not be selling our diminishing natural heritage for short term dollars.

Most folk don't venture beyond Kiwi Flat hut. Or they restrict themselves to visiting Scamper Torrent hut and the Smythe Range tops looping back to Kiwi Flat. What a travesty to have hydro scheme structures in view at the other end of the flat. Westpower's proposal and the DoC response both state that the impact of this development would be minimal. I find that astounding. The Waitaha is not just another West Coast valley. It has 'wilderness' values in it's degree of ruggedness with prime mountain country in it's headwaters.

The Mokihinui fiasco need not be revisited. This scheme is looking like it is again going to be treated by DoC as a cash cow and any local Maori input should not be given any weight either after the sell out for cash up north. We have had enough of dams ruining rivers in New Zealand. This area has vastly more value than the small amount of power to be sieved out of the Waitaha.

Once this industrial site is created, another rip is created in the, sadly little, remaining wild areas.

Come on DoC! You are working for us, not to wrangle money out of a power company to fill sadly depleted coffers with minimal cabinet support. We want a country with conservation values to be proud of. I love so much of the work that you do in a difficult financial situation, but this is awful.

Our country needs to be looking at reducing power usage not greedily thinking up ways to make money involving more power demand and leading to these out dated proposals. How much is a relatively untouched valley like the Waitaha worth now and, even more so, in the future?

Thank

you

Lucy Croft

From:
Sent: Friday, 14 October 2016 8:10 p.m.
To: Permissions Hokitika
Subject: Morgans Gorge Hydro Scheme.

To Whom it may concern

This email is in regards to the proposed hydro scheme on Morgans gorge on the Waitaha.

I would hate to see this happen as after travelling the world Morgans Gorge remains one of the most spectacular places I have ever visited and I would hate to see this paradise tampered with.

Kind regards

Lucy Croft

From:
Sent: Friday, 14 October 2016 2:54 p.m.
To: Permissions Hokitika
Subject: Proposed Waitaha River hydro scheme

We wish to strongly object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a run of river hydro scheme on the Waitaha River on the West Coast.

The Waitaha River is a pristine, wild river, a non-renewable and globally rare resource. It is astounding the minister would even consider a proposal that would change the nature of this outstanding natural feature for ever. There appear to be other less damaging alternatives, if a new source of power is really required for the West Coast.

This situation seems to have arisen from the lack of action over assessing the conservation value of stewardship lands. It is unforgivable that these areas are being opened up for commercial development because the Government has not committed the resources necessary to assess and properly classify areas containing outstanding natural features, like the Waitaha River.

We find it totally unacceptable that, according to reported comments by DOC staff, the minister's involvement in this case has been "limited".

She needs to give the case her full and urgent attention and stop this environmental tragedy in its tracks.

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

Lucy Croft

From:
Sent: Saturday, 15 October 2016 1:01 p.m.
To: Permissions Hokitika
Subject: Pauline Adams, ATT: Director-General

To the Director-General,
Please accept this email as my out-right objection to the proposed damming of the Waitaha River.
As a NZOIA member and assessor I work with hundreds of students at a tertiary level and continually support the values of remote and natural New Zealand.
Please consider our younger population and protect these pockets of New Zealand for future enjoyment.
Regards,

Lucy Croft

From:
Sent: Saturday, 15 October 2016 8:17 a.m.
To: Permissions Hokitika
Subject: RE: Pauline Adams - No Waitaha Dam in Morgans gorge!

Please help us keep the Waitaha free flowing! this alpine to coastal river is amazing and has huge significance for all users and has pristine environmental beauty and importance!
I have paddled the river and plan to do so many more times and would also love to explore morgans gorge when the time is right!

NO WESTPOWER DAMS ON THE WAITAHA OR MORGANS GORGE !!!!

Yours sincerely -

Lucy Croft

From:
Sent: Saturday, 15 October 2016 2:15 p.m.
To: Permissions Hokitika

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams,

I strongly oppose the granting of concession for the construction of a dam on the Waitaha River. This is conservation land that needs preserving for biodiversity and recreational reasons.

As is stated in the Boffa Miskell report at section 4.2.3 – Appendix 9 of Westpower's Waitaha application :

"The Upper Waitaha Catchment, within which the proposed scheme would be located, is an area of outstanding natural values. This is acknowledged by Westpower and its consultants. Westpower's consultant, Boffa Miskell, concludes that:⁸⁵ 83 Hydrology of the Waitaha Catchment: A report for Electronet Services Ltd, September 2013, Martin Doyle, September 2013, at page 2 84 Approximate tunnel representation has been added by the author of this report. 3D map comes from "Hydrology of the Waitaha Catchment: A report for Electronet Services Ltd", September 2013, Martin Doyle, September 2013.

⁸⁵ Boffa Miskell report at section 4.2.3 – Appendix 9 of Westpower's Waitaha application Financial viability of Waitaha hydro proposal, April 2015 Baldwin Consulting Page 75 of 216 Draft

"...based on the above assessment and within the context and relevant policies of the District and Regional Plan, it is assessed that the Upper Waitaha Catchment contains very high, near pristine levels of naturalness and that the landscape (at both a district and regional scale) be considered "conspicuous, eminent, especially because of excellence". This includes the area around the powerhouse site." Boffa Miskell further summarised the natural values of the Upper Waitaha Catchment as follows: "It is considered that they hold high intactness, scientific and distinctiveness values, as recognised in the Westland District Plan to be considered outstanding."⁸⁶ The local adverse effects of the proposed scheme on natural character, landscape, visual amenity and recreational (kayaking) values have been assessed as high.⁸⁷

This project should not proceed.

Regards

Lucy Croft

From:
Sent: Monday, 17 October 2016 10:33 p.m.
To: Permissions Hokitika
Subject: Waitaha Hydro Proposal

To whom it may concern,

I would like to submit an objection to the Hydro scheme proposed on the Waitaha Rivers Morgan Gorge.

I am a whitewater kayaker from Australia who mostly resides in New Zealand. I have kayaked all over the world and nowhere compares to the Waitaha river and it's pinnacle in the Morgan Gorge. For pure beauty it is as spectacular as it gets. It is completely unique and as of yet I have not had a chance to kayak through it. It is a challenge that I have been training for for many years and the ultimate wilderness of the area will be taken away along with it's water under this proposal. It is a measly amount of energy to destroy one of the worlds few remaining truly wild and scenic places.

We are losing rivers all over the world to Hydro at an alarming rate, while the USA is blowing theirs up to restore habitat and fisheries. We are losing them under the pretence that Hydro is clean and green but recent science is proving that even without all the habitat destruction being included they are still dirty energy. Then the people who are supposed to protect our environment (DOC thats you) are approving the destruction of it.

I hope you allow me and future generations the opportunity to enjoy this truly wild and spectacular wilderness area in all it's greatness and don't allow the destruction of something so unique.

Thanks for your time

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:**ADDRESS FOR SERVICE:****CONCESSION APPLICANT DETAILS:**

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

Details of application:

The applicant wishes to obtain a concession to construct, maintain and operate a run-of-the-river hydro scheme at the Morgan Gorge on the Waitaha River on Department of Conservation (DOC) stewardship land. Westpower propose to take water off through a highly visible weir across the river and tunnel entrance located in the rock face on the true right bank at the start of the Morgan Gorge. This structure and an adjacent access tunnel portal will be significant industrial intrusions into an otherwise pristine landscape and environment. The scheme proposes to take much of the flow of the river (up to 23 cumecs, river median flow (50% of the time) is 19 cumecs) and leave a residual flow of 3.5 cumecs in the Morgan Gorge at all times – higher and flood flows will still travel down the Morgan Gorge when the proposed Westpower take is exceeded. The water is returned to the river about 2.5 km downstream of the intake via a powerhouse on the north bank of the river.

The reach of the Waitaha River that is of particular concern with respect to the current requested concession is from the powerhouse site upstream to the headwaters of the Waitaha River, and including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

I wish to be heard in support of this submission.

Introduction

The Morgan Gorge on the Waitaha River, and the Upper Waitaha River including the Waitaha and Windhover Gorges and catchment to the main divide constitute an outstanding wild and scenic river, with outstanding natural beauty, scenery and wilderness values, and outstanding kayaking values for expert and developing kayakers. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers. Therefore, like their exemplars of other outstanding beginner, intermediate, advanced and expert white water runs water throughout the country, some of which are protected by Water Conservation Orders, this river warrants the same statutory recognition and protection.

The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

Request Declining the Granting of the Concession

I request that the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River be reversed and that the concession not be granted as the proposed development:

- will impact severely on the natural feature and wilderness and scenic values of the spectacular, powerful, majestic, water carved, fluted, schist rock Morgan Gorge, which separates the upper wild and scenic Waitaha back country catchment from the front country, as well as the whole catchment
- is incompatible with the outstanding natural feature (ONF) status of the Morgan Gorge and outstanding natural landscape (ONL) status of the Waitaha River from the bottom of the Morgan Gorge to the headwaters and values of the stewardship land involved
- is incompatible with the purpose of the Conservation Act, and especially with respect to the purpose of DOC stewardship land
- is not needed for the power it will generate, nor would it provide for greater reliability of power distribution for the West Coast
- is contrary to various Objectives and Policies in Regional and District Plans and the West Coast Conservation Management Strategy

- will prevent current recreational users and particularly kayakers from accessing the Morgan Gorge and a river reach below
- will severely impinge and intrude on the outstanding kayaking, white water, wilderness and landscape values of a wild and scenic West Coast river. The proposed scheme will have a significant adverse effect on the outstanding kayaking values in the river. Such issues are not properly addressed in the application
- the mitigation offered if the scheme goes ahead is not sufficient, workable, or appropriate. This concession without appropriate consent conditions will effectively stop kayakers using the resource, not just in the Morgan Gorge but elsewhere in the catchment, where no mitigation is provided
- New Zealand is swamped with power generation, there are plenty of other less damaging consented power schemes and infrastructure on the West Coast available to provide power, MBIE say we don't need the power, so if this extra generation is not needed why ruin the beautiful wild Waitaha River?
- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!

The Waitaha river is one of the last remaining wilderness' in NZ. In a country where wild tourism is beginning to dominate the West Coast economy and produce much more value than any previous economy, it is vital to preserve, maintain and strengthen what resources we have that remain. The West Coast is unlike any other region in NZ, save for perhaps the East Cape of the North Island and the Fjords of the deep south. These areas are incredibly inspiring and motivate any NZ person to continue to explore and create adventure in their lives. It has personally touched me in a way that other parts of society can never hope to achieve, by letting me explore the untouched wilderness and educate myself through troubles and tribulations. Every person in NZ deserves to have access to these areas, yet every generation seems to have less and less. Do not let Morgan's gorge become another one of these tragic tales and let it continue to inspire NZ people to become great adventurers and renowned people. If anything, please take the time and effort instead to try and enhance the wilderness that NZ offers. Electricity generation is certainly required, but not in this area of NZ.

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 19, 2016

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:**ADDRESS FOR SERVICE:****CONCESSION APPLICANT DETAILS:**

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

Details of application:

The applicant wishes to obtain a concession to construct, maintain and operate a run-of-the-river hydro scheme at the Morgan Gorge on the Waitaha River on Department of Conservation (DOC) stewardship land. Westpower propose to take water off through a highly visible weir across the river and tunnel entrance located in the rock face on the true right bank at the start of the Morgan Gorge. This structure and an adjacent access tunnel portal will be significant industrial intrusions into an otherwise pristine landscape and environment. The scheme proposes to take much of the flow of the river (up to 23 cumecs, river median flow (50% of the time) is 19 cumecs) and leave a residual flow of 3.5 cumecs in the Morgan Gorge at all times – higher and flood flows will still travel down the Morgan Gorge when the proposed Westpower take is exceeded. The water is returned to the river about 2.5 km downstream of the intake via a powerhouse on the north bank of the river.

The reach of the Waitaha River that is of particular concern with respect to the current requested concession is from the powerhouse site upstream to the headwaters of the Waitaha River, and

including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

Introduction

The Morgan Gorge on the Waitaha River, and the Upper Waitaha River including the Waitaha and Windhover Gorges and catchment to the main divide constitute an outstanding wild and scenic river, with outstanding natural beauty, scenery and wilderness values, and outstanding kayaking values for expert and developing kayakers. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers. Therefore, like their exemplars of other outstanding beginner, intermediate, advanced and expert white water runs water throughout the country, some of which are protected by Water Conservation Orders, this river warrants the same statutory recognition and protection.

The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

Request Declining the Granting of the Concession

I request that the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River be reversed and that the concession not be granted as the proposed development:

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- is incompatible with the purpose of the Conservation Act, and especially with respect to the purpose of DOC stewardship land
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and landscape values of a wild and scenic West Coast river. The proposed scheme will have a significant adverse effect on the outstanding kayaking values in the river. Such issues are not properly addressed in the application

- the mitigation offered if the scheme goes ahead is not sufficient, workable, or appropriate. This concession without appropriate consent conditions will effectively stop kayakers using the resource, not just in the Morgan Gorge but elsewhere in the catchment, where no mitigation is provided
- New Zealand is swamped with power generation, there are plenty of other less damaging consented power schemes and infrastructure on the West Coast available to provide power, MBIE say we don't need the power, so if this extra generation is not needed why ruin the beautiful wild Waitaha River?
- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 19, 2016

Lucy Croft

From:
Sent: Tuesday, 18 October 2016 10:24 a.m.
To: Permissions Hokitika
Cc:
Subject: Submission on WestPower Ltd's hydro proposal for the Waitaha River

Dear WestPower,

It greatly troubles me the you are wanting to dam the Waitaha River and Morgan gorge.

I am a born and bred New Zealander, I love our wonderous outdoors and all the amazing places NZ has, I also do a little bit of whitewater kayaking.

I will probably never be a good enough paddler to run Morgan Gorge, but I have seen footage of other paddlers running it and it is an absolutely incredible gem NZ has, invaluable and rare.

Even here in NZ there are few untouched and untainted places, please don't destroy this one.

Most people (including New Zealanders) will never see or even hear our precious kiwi in the wild, but does that mean we shouldn't do our bit and protect them from extinction? No. The same goes for our land and Morgan Gorge.

Don't dam the Waitaha and Morgan Gorge.

Regards,

Lucy Croft

From:
Sent: Tuesday, 18 October 2016 10:28 a.m.
To: Permissions Hokitika
Cc:
Subject: Submission on WestPower Ltd's hydro proposal for the Waitaha River

Kia Ora,

As an a keen kayaker and proud of NZ's waters, forests and wildlife, it concerns me to hear that another hydro scheme in a lowly populated region is being considered. With advances being made everyday in Technology it is surprising that ways to reinvigorate the current hydro systems an electricity network aren't a requirement by the Minister first. Surely, there are ways to upgrade and improve power systems rather than build another Hydro system.

As caretakers of this great country and by default, the wardens for our unique flora and fauna, there is a requirement to carefully consider any new scheme that affects our conservation areas including the rivers, riverbeds and riparian strips. Another hydro scheme does not appear to meet that requirement in this era of environmental awareness.

Whilst I enjoy kayaking and the loss of another river does not sit well, it is not my main driver for opposing the dam, rather the loss of pristine NZ country of which this area is re known, and retaining our unique habitat for future generations. In this environmental era, there should be an increase to conservation areas not degradation.

I therefore oppose the hydro system, in favour of the Minister and Government requiring investigation upgrades and rejuvenation of existing power systems.

Lucy Croft

From:
Sent: Tuesday, 18 October 2016 10:54 a.m.
To: Permissions Hokitika
Subject: Submission on the proposed Waitaha Hydro Scheme by Westpower under Section 17U of the Conservation Act 1987

Submission on the proposed Waitaha Hydro Scheme by Westpower under Section 17U of the Conservation Act 1987

TO: Director-General

Department of Conservation

Private Bag 701

Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:

Introduction

I am an Outdoor instructor and a whitewater kayak/Rafter who like so many others, does not want to see "another" New Zealand river being compromised. I say "another", but this is not just another river. The Waitaha is the pinnacle of New Zealand Rivers in terms of kayaking difficulty and beauty, and to alter that would be a shame.

Submission

Lucy Croft

From:
Sent: Tuesday, 18 October 2016 11:21 a.m.
To: Permissions Hokitika
Subject: waitaha river objection

CONSERVATION ACT 1987 SECTION 17Q

SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS

TO: Director-General

Department of Conservation

Private Bag 701

Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:

ADDRESS FOR SERVICE:

Address 3

Address 4

Phone:

Email: _____

CONCESSION APPLICANT DETAILS:

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

Details of application:

The applicant wishes to obtain a concession to construct, maintain and operate a run-of-the-river hydro scheme at the Morgan Gorge on the Waitaha River on Department of Conservation (DOC) stewardship land. Westpower propose to take water off through a highly visible weir across the river and tunnel entrance located in the rock face on the true right bank at the start of the Morgan Gorge. This structure and an adjacent access tunnel portal will be significant industrial intrusions into an otherwise pristine landscape and environment. The scheme proposes to take much of the flow of the river (up to 23 cumecs, river median flow (50% of the time) is 19 cumecs) and leave a residual flow of 3.5 cumecs in the Morgan Gorge at all times – higher and flood flows will still travel down the Morgan Gorge when the proposed Westpower take is exceeded. The water is returned to the river about 2.5 km downstream of the intake via a powerhouse on the north bank of the river.

The reach of the Waitaha River that is of particular concern with respect to the current requested concession is from the powerhouse site upstream to the headwaters of the Waitaha River, and including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

I wish to be heard in support of this submission.

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The Morgan Gorge on the Waitaha River, and the Upper Waitaha River including the Waitaha and Windhover Gorges and catchment to the main divide constitute an outstanding wild and scenic river, with outstanding natural beauty, scenery and wilderness values, and outstanding kayaking values for expert and developing kayakers. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers. Therefore, like their exemplars of other outstanding beginner, intermediate, advanced and expert white water runs water throughout the country, some of which are protected by Water Conservation Orders, this river warrants the same statutory recognition and protection.

The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

Request Declining the Granting of the Concession

I request that the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River be reversed and that the concession not be granted as the proposed development:

- will impact severely on the natural feature and wilderness and scenic values of the spectacular, powerful, majestic, water carved, fluted, schist rock Morgan Gorge, which separates the upper wild and scenic Waitaha back country catchment from the front country, as well as the whole catchment

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- New Zealand is swamped with power generation, there are plenty of other less damaging consented power schemes and infrastructure on the West Coast available to provide power, MBIE say we don't need the power, so if this extra generation is not needed why ruin the beautiful wild Waitaha River?
- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 18, 2016

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:**ADDRESS FOR SERVICE:**

Phone:

Email:

CONCESSION APPLICANT DETAILS:

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

Details of application:

The applicant wishes to obtain a concession to construct, maintain and operate a run-of-the-river hydro scheme at the Morgan Gorge on the Waitaha River on Department of Conservation (DOC) stewardship land. Westpower propose to take water off through a highly visible weir across the river and tunnel entrance located in the rock face on the true right bank at the start of the Morgan Gorge. This structure and an adjacent access tunnel portal will be significant industrial intrusions into an otherwise pristine landscape and environment. The scheme proposes to take much of the flow of the river (up to 23 cumecs, river median flow (50% of the time) is 19 cumecs) and leave a residual flow of 3.5 cumecs in the Morgan Gorge at all times – higher and flood flows will still travel down the Morgan Gorge when the proposed Westpower take is exceeded. The water is returned to the river about 2.5 km downstream of the intake via a powerhouse on the north bank of the river.

Thanks sending your submission to DOC. This will only take about 2 minutes of your time, more if you wish to submit additional reasoning to help your submission. The text highlighted in yellow is info for you only and needs to be removed from the document once you have finished your submission.

The text in areas highlighted in green are those where you need to fill in your details, and then remove the highlighting in your finished submission.

By all means call Doug Rankin 027 843 4447 if you are not sure and would like some guidance. Good luck with your submission writing.

CONSERVATION ACT 1987 SECTION 17Q

SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:

name

ADDRESS FOR SERVICE:

Address 1
Address 2
Address 3
Address 4

Phone: number

Email: _____

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The reach of the Waitaha River that is of particular concern with respect to the current requested concession is from the powerhouse site upstream to the headwaters of the Waitaha River, and including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

I wish to be heard in support of this submission.

(change if you do not wish to attend a hearing)

Introduction

The Morgan Gorge on the Waitaha River, and the Upper Waitaha River including the Waitaha and Windhover Gorges and catchment to the main divide constitute an outstanding wild and scenic river, with outstanding natural beauty, scenery and wilderness values, and outstanding kayaking values for expert and developing kayakers. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers. Therefore, like their exemplars of other outstanding beginner, intermediate, advanced and expert white water runs water throughout the country, some of which are protected by Water Conservation Orders, this river warrants the same statutory recognition and protection.

The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

Request Declining the Granting of the Concession

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separates the upper wild and scenic Waitaha back country catchment from the front country, as well as the whole catchment

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- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!

add any additional reasons of your own here.

Pristine natural environment and should not be

(you may want to add in more explanation here further elaborating on the reasons for your submission, including information on your own background and experience and connection with and interest in the Waitaha river)

lost

For these reasons I ask that the decision on the concession application be declined and the Minister decline granting the concession to Westpower.

Date: 10/17/2016

Submission on Westpower hydro DOC concession

CONSERVATION ACT 1987 SECTION 170**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:**ADDRESS FOR SERVICE:****CONCESSION APPLICANT DETAILS:**

Applicant's name: Westpower Limited

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River, and including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

I DO NOT wish to be heard in support of this submission.

Introduction

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- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!
- *This is irreversible and if it was even required should be done in an area where the impact is insignificant, not significant as this is*
- *We, New Zealand, should be a leader in conservation particularly of our wilderness and this behaviour is destructive to our quality of life and country image*

I am an avid whitewater kayaker and outdoor enthusiast. I take great pride in what our country has to offer in respects to this. We must conserve and improve what we have and these types of irreversible and avoidable activities for current and future generations for both citizens and tourists alike

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 16, 2016

Lucy Croft

From:
Sent: Tuesday, 18 October 2016 4:35 p.m.
To: Permissions Hokitika
Cc:
Subject: Attn.: Pauline Adams. Submission on the Minister of Conservation's intention to grant a concession to Westpower Limited to construct and operate a run of the river hydro scheme on the Waitaha River on the West Coast

Attn: Pauline Adams

Submission by:

Re: the Minister of Conservation's intention to grant a concession to Westpower Limited to construct and operate a run of the river hydro scheme on the Waitaha River on the West Coast

I am OPPOSED to granting a concession to Westpower Ltd. to construct and operate a run of the river hydro scheme on the Waitaha River on the West Coast.

- Electricity industry experts and MBIE say there is no need for this scheme.
- if local generation was required on the West Coast there are a number of other hydro projects that are already fully consented and waiting to be built.
- it would be a shame to ruin this wild and beautiful river, the Waitaha River !
- The Waitaha is one of the less than 1% of rivers remaining in the world that is not modified, so let's look after our future and not repeat the mistakes of the past.

do not wish to be heard at the hearing.

Yours sincerely,

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:**ADDRESS FOR SERVICE:****CONCESSION APPLICANT DETAILS:**

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

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I wish to be heard in support of this submission.

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The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

"Water has mauri, essential sanctity, both as wai māori and as wai tai. Water must be kept in its natural state as far as it is possible to do so."

-James Ritchie, Te Ika Whenua Rivers Report (1998)

Request Declining the Granting of the Concession

I request that the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River be reversed and that the concession not be granted as the proposed development:

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- the kayaking mitigation offered if the scheme goes ahead is not sufficient, workable, or appropriate. This concession without appropriate consent conditions will effectively stop kayakers using the resource, not just in the Morgan Gorge but elsewhere in the catchment, where no mitigation is provided
- The Greenaway report provided with the application has numerous factual errors in relation to both current kayaking and the low impact gold mining activity taking place in the Waitaha.
- New Zealand is swamped with power generation, there are plenty of other less damaging consented power schemes and infrastructure on the West Coast available to provide power, MBIE say we don't need the power, so if this extra generation is not needed why ruin the beautiful wild Waitaha River?
- In a world increasingly losing wilderness, wild and scenic rivers are an important part of the clean green country tourists come to New Zealand to experience and that DOC has an obligation to look after. It beggars belief that DOC is proposing to use the excuse of stewardship land not to do better, when the conservation values of this special place are so clear and obvious.
- New Zealand's international reputation and clean/green image will be further damaged by this proposal proceeding.
- Wild and scenic rivers are valued both as part of our natural environment and cultural heritage. They are sources of clean fresh water, bird, and aquatic life, and provide wild waters and river environments for people to enjoy. Many of these rivers also play a special part in New Zealand's heritage. The stories of many Iwi and hapu as well as European pioneers relate to these wild rivers. For both Pakeha and Maori, many of these rivers tie in closely with our identity.
- Under the Conservation Act, the Minister of Conservation can only give permission to build and operate a hydroelectric scheme on the conservation estate if it:
 1. would not compromise the purposes for which the land is held
 2. could not reasonably be done elsewhere, including in another conservation

area where the effects would be less significant.

The range of real alternatives to any proposed hydroelectric development is very broad as all power stations across the country are connected through the national grid. The reduction in carbon dioxide emissions provided by the proposed scheme can be provided not only by hydroelectricity generation elsewhere, but by geothermal stations, wind farms, upgrading transmission and distribution lines (recently completed for the West Coast), and by reducing electricity demand through more efficient or reduced use.

- This proposal does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!

I am a passionate New Zealander and have been a regular visitor to the West Coast since I first visited it in 1977. I now visit the West Coast between 2 and 4 times per annum on average, for anything between 2 days and 2 weeks. The main purpose of my visits is to kayak on the magnificent rivers in one of the world's special places. When not kayaking, I'll be tramping in the hills or mountain biking on the back roads and tracks such as the spectacular Old Ghost Road and West Coast mountain bike trail.

Having been brought up at the foot of the beautiful Hutt river gorge, my connection to our rivers runs deep, way beyond the level of a resource to be consumed. DOC has a responsibility for kaitiakitanga principles and should NEVER agree to dewatering the Waitaha - reducing Te Mana o Te Wai. And for what?

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 18, 2016

Lucy Croft

From:
Sent: Tuesday, 18 October 2016 9:31 p.m.
To: Permissions Hokitika
Cc: niconservation+waitaha@rivers.org.nz
Subject: Submission on WestPower Ltd's hydro proposal for the Waitaha River

Dear People

I have spent a lot of time in South Westland on various rivers whitewater kayaking, and I am crestfallen at the idea that the hydro scheme on the Waitaha River is even being considered. We have very few un-modified rivers in New Zealand with the wonderful heritage and wilderness values that the Waitaha represents will be sadly un-done by this ill-thought out scheme. There are many other pre-approved schemes that are waiting in the wings with approvals already consented and I find it crazy that such a wonderful wilderness area could be changed forever by a hydro scheme.

I implore the government to go back on any plans to change this environment in any fashion. We have lost too much already.

Yours faithfully

Whitewater kayaker for 35 years

**Submission of to the Department of Conservation:
Regarding the Minister of Conservation's notified intention to grant concessions to
Westpower to enable it to develop a run of river hydro scheme on the Waitaha River.**

October 10, 2016

My name is . I am 62-year-old chartered professional engineer (CPEng) from Christchurch, working in the area of civil infrastructure. For approximately twenty years I have worked as an estimating manager for a national civil construction company. In this capacity I have wide experience of pricing and oversight of major project such as tunnels, hydro schemes, irrigation schemes, roads, bridges, and water and wastewater systems.

I wish to register my very strong opposition to the granting of concessions to Westpower for this project.

As an active trumper for the last 40 years, and having tramped the Waitaha Valley three times, I consider this catchment to be the epitome of South Island back country wilderness experience. The Waitaha from Morgan Gorge to the divide is entirely unmodified and pristine, is scenically outstanding, and it is tough and demanding country and therefore offers solitude because few people have the fitness or experience to attempt it. When I think of my experience as a trumper in this wild landscape it takes me to the heart of what it means to me to be a New Zealander.

However, my objection to the granting of concessions for the Westpower scheme is not simply because I would like to tramp again in the same unmodified wilderness that I have visited in the past, but because it would contravene both the spirit and the letter of the Conservation Act in several ways, as I will detail below.

1. The purpose for which the land is held by DOC.

The Waitaha Valley is in the DOC estate and is classed as stewardship land. The Conservation Act requires DOC to manage it so that its "natural and historic resources are protected" (Section 25). According to the associate minister of conservation at the time the Conservation Act was passed by Parliament, Philip Woollaston, the stewardship category was created to hold conservation land for the following purpose:

"The clear intention in creating stewardship areas was to protect them from development or extractive use until their conservation value could be established, the appropriate form of protection chosen...; unless of course the conservation values were found to be inadequate, when the area would be disposed of..." (1)

Further, the New Zealand Conservation Authority states that it has been advised by DOC that:

*"...only activities with 'truly minor' effects can be approved by a concession, irrespective of what off-footprint mitigation, environmental compensation, or biodiversity offset is offered....
"The Authority understands that this means that virtually no activity which involves a substantive footprint resulting in a loss of any natural resources (which are very widely defined) in a stewardship area can be granted a concession." (2)*

I have no reason to think that the NZCA's interpretation of DOC policy would be incorrect, given that the NZCA is a statutory body whose role is to advise DOC and the Minister. Thus the granting of concessions to Westpower would contravene not only the black letter of the Conservation Act and the intent of Parliament, but also the policy of the department.

Westpower seeks to construct permanent industrial infrastructure in an outstanding natural feature within a broader outstanding natural landscape. It will largely de-water the Morgan Gorge. According to DOC's own officer's report, the broad scale landscape impact of the scheme is "greater than low", the visual amenity effect is "high", the impact on the local scale landscape of the Gorge is "high" and the natural character effect is "moderate". In my opinion each of these judgements significantly understates the actual impact on the environment, but in any case none are "truly minor". Therefore Westpower's application must be refused.

2. Part 3B of the Conservation Act

The Minister is obliged to refuse Westpower's application for concessions because it fails to meet the requirements laid out in the Act, as follows:

- *Section 17U(2) The Minister may decline any application if the Minister considers that ... There are no adequate methods or reasonable methods for remedying, avoiding or mitigating the adverse effects of the activity, structure or facility.*

Westpower seeks to divert most of the flow of the Waitaha River away from the Morgan Gorge, which is agreed by the applicant to be an outstanding natural feature. It will also introduce large permanent structures (a weir, intake and tunnel) into the landscape. The diversion and the landscape intrusions are unable to be mitigated. Without them Westpower would not be able to generate electricity. Westpower claims that it has mitigated the effects by not damming the river and forming a lake: this is an illogical straw man argument that has no merit. The only question for the minister is whether the structures and effects that are proposed are able to be mitigated, and it is clear that they cannot be. Thus the Minister should decline the application on this ground alone.

- *Section 17U(3): The minister shall not grant an application for a concession if the proposed activity is contrary to the provisions of the Act or the purposes for which the land concerned is held.*

As already discussed, the land is held for the purpose of protecting its natural and historical resources, and to protect it from development and extractive uses until its conservation values can be assessed. To grant the concessions would thus contravene this section of the Act. The language of the Act is very directive – "*the Minister shall not grant*" – thus there is no discretion available to her. The Minister **must** decline the application.

- *Section 17U(4): The Minister shall not grant an application for a concession to build a structure or facility..., where he or she is satisfied that the activity –*
 - (a) Could reasonably be undertaken in another location that –*
 - (i) is outside the conservation area to which the application relates;*

(ii) or is in another conservation area or in another part of the conservation area to which the application relates, where the potential adverse effects would be significantly less.

The Department has received information in the course of its consultation with White Water NZ that alternatives clearly do exist to the construction of a hydro scheme on the Waitaha River. For instance, within the West Coast region there is a 44 MW scheme that is already fully consented (the Arnold River scheme), but which has not been constructed. The economics of the Waitaha scheme are similar to the Arnold scheme on a cost per MW basis, yet Trustpower has put the Arnold scheme on hold because it is not viable to build given the current outlook for power prices. Further, there is a range of projects around New Zealand that are consented but not yet built because sufficient demand for new generation does not exist. All of these are alternatives to Westpower's proposed Waitaha scheme, in that they would all generate electricity which would be sold into New Zealand's integrated national electricity market. Any electricity generated by Westpower in the Waitaha Valley would be entirely interchangeable with electricity generated from any other scheme in any other part of the country. Electricity is a commodity. It is not branded. When the consumer turns on the lights he or she does not know where that electricity was made, or by which company. It is transmitted by a highly efficient national grid, which is recognised to be in an excellent state of repair and in fact has surplus capacity feeding into Westpower's local distribution region.

Thus there are alternative places where the activity that Westpower seeks to undertake can be undertaken, which do not require the construction of industrial infrastructure and the diversion of a wild river in a pristine environment.

Again, the Act is highly directive – *"the Minister shall not grant"* – if there are alternative locations where the activity could be undertaken. It is inarguable that there are alternative locations, and so only one option is available to the Minister, which is to refuse to grant the concessions.

The department's Conservation General Policy gives further guidance on this point, should it be required:

11.3 (a) Utilities may be provided for on public conservation lands and waters where they cannot be reasonably located outside public conservation lands and waters, or if specifically provided for as a purpose for which the place is held.

As discussed above, it is clear that the utilities that Westpower seeks to build can be reasonably located outside conservation lands and waters.

3. Demand for electricity

As discussed above, wholesale electricity prices are flat, and the forward market shows demand is expected to remain flat for the foreseeable future. The Minister of Energy has stated publicly that New Zealand has enough already-consented generation projects in the pipeline to meet demand for the next 30 years. In other words, the New Zealand electricity market – which includes the West Coast – is

amply supplied with electricity, and there is a long list of consented projects sitting on hold because there is not enough demand to justify their construction.

Further, Transpower has in recent years completed a major upgrade of its transmission lines into the West Coast, which means there are no transmission constraints in the region.

There is simply no need for the Waitaha scheme to be built. If Westpower was proposing to build a new hydro scheme in an already-modified environment that was not on conservation land with outstanding natural values, then that would be entirely a commercial decision for its board and shareholders. But the Waitaha scheme involves the major intrusion of industrial structures and the diversion of a wild and scenic river from its natural course, in an area recognised by all participants to be an outstanding natural landscape and which is governed by the Department of Conservation on behalf of the current and future citizens of New Zealand on the understanding that its values will be protected.

Perhaps if the nation was facing brown-outs due to inadequate supply, or if the West Coast was suffering economically because of transmission bottlenecks that prevented commercial, industrial and household users from functioning normally, the Waitaha scheme *might* be justifiable. But this is manifestly not the case. The development of this scheme would involve the ir retrievable loss of wilderness values, for the sake of electricity generation that is simply not needed.

Westpower says it wants to develop the scheme to enable the West Coast to be more self-sufficient in electricity. This argument is a nonsense given that, as discussed, electricity in New Zealand is traded as a national commodity. Westpower's ambition for self-sufficiency is not a justification for DOC to grant the concessions sought.

4. New Zealand's international brand and image

New Zealand trades on its clean, green image, and the DOC estate is the jewel in this country's reputational crown. In a world where, according to the Parliamentary Commissioner for the Environment, only 1% of rivers remain in their natural state, New Zealand will increasingly earn a premium for its products and services by showing that we do protect our wild rivers and landscapes from inappropriate development. The elite white water kayaking community is small, but it is a highly mobile international group. The Morgan Gorge is the pinnacle of white water achievement; if DOC permits Westpower's scheme to proceed, it will be noticed and commented on internationally. In all likelihood, the international commentary will agree with the interpretation of White Water NZ in its report on the Waitaha scheme, that Westpower's proposal is a travesty.

I, too, agree with White Water NZ's assessment. To allow this scheme to go ahead in this special place would be a travesty and a grievous loss to New Zealand's conservation heartland.

5. Financial risk

In my career I have had experience of a wide range of large civil engineering projects, including tunnels and hydro schemes. Westpower says the Waitaha scheme would cost \$80-100 million, but tunnels are extremely risky from a financial point of view. Geological

drilling will help to determine the tunnelling conditions, but given that the site is one kilometre from the alpine fault the potential is for fractured and broken rock that will make for slow progress, require extensive support structures, and increased costs. This is one of the lessons from the Pike River mine project, where tunnelling conditions were much more difficult than expected, resulting in a massive cost blowout.

Tunnels are also extremely risky from a health and safety point of view.

I note the reasoning of the Hon Nick Smith, formerly Minister of Conservation, in declining an application to build a tunnel in Fiordland, where aspects of financial, economic and health and safety risk weighed against the granting of concessions for a project that would have had adverse environmental effects:

"I am not satisfied that the tunnel can be safely built for a price that makes it economically viable. The risk for the Government under these circumstances is that corners are cut or the project is left half-finished with a clean-up liability for the Government." (3)

6. Future guardianship of this region

Large areas of DOC land from Arthurs Pass National Pass to Fiordland National Park (including the Upper Waitaha Valley) are classed as stewardship land. I believe this whole area should be given national park status, thus preserving it for future generations.

Footnotes

- (1) As cited in "Investigating the future of conservation: The case of stewardship land", Parliamentary Commissioner for the Environment, August 2013
- (2) Stewardship Land: Net Conservation Benefit Assessments in Land Exchanges Report from the New Zealand Conservation Authority, 22 January 2016
- (3) "Government axes Milford tunnel". Stuff website, 17 March 2013, retrieved 9 October 2016.



13 October 2016

Director General
Department of Conservation
Private Bag 701
Hokitika 7842
Attn: Pauline Adams

Dear Sir,

Re: Westpower Limited Waitaha River Hydropower Scheme Concession

I recommend that the Minister of Conservation decline this application in total, as the Morgan Gorge section of the Waitaha River is a finite natural resource within the conservation estate. From previous work associated with water conservation orders where I have applied a methodical analysis to qualify physical and visual elements, it is my conclusion that the Morgan Gorge is an Outstanding Natural Feature of National Significance.

An outline of my assessment for this conclusion is as follows.

Cross profile – this narrow ravine-like section of the Waitaha has been formed by progressive down cutting of the river through a weak line of soft base rock. The side slopes are commonly over steepened and feature buttress-like rock formations that overhang the channel of the river. The rock formations are interspersed by narrow ledges and loose rubble fields.

Riverine characteristics – the line of the channel within the Morgan Gorge is slightly curving and is physically entrenched within the rock-hewn walls. Rock ledges and flood ledged boulders define the edge of the channel.

In-stream elements – the Morgan Gorge section of the river contains a diverse assemblage of in-stream elements that comprise white water rapids, rocky point bars and flood lodged boulders. The abrupt change in gradient in this section of the river created waterfalls that plunge into deep pools.

Naturalness (qualitative ranking High) – this section of the Waitaha River possesses a high component of native vegetation with the gorge being bounded by mixed shrublands that grade unto unmodified hardwood forest.

Legibility (qualitative ranking Exceptional) – within the Morgan Gorge the raw untamed power of water through the process of fluvial down cutting is highly conspicuous. The various rock formations and strata exposed during the river's down cutting are both raw and visually striking.

Aesthetic factors (qualitative ranking High) – the Morgan Gorge conveys a sense of visual confinement and is intimate in scale. Within this context both the river and its

natural environs are codominant elements. Descriptive terms that help to portray this section of the Waitaha River include: foreboding, eerie and untamed.

Visual coherence (qualitative ranking High) – this section of the river possesses a high degree of coherence with the original character of the river being completely unmodified. Presently there is complete absence of man-made elements.

It is widely acknowledged that when the volume of water in a river is reduced, this frequently has an impact on the “feel” of the river. In the case of the Morgan Gorge there would be a reduction in rapids, less white water and more riffles established. Placid shallower reaches would replace the existing surge pools. The permanent reduction in water would result in the margins of the river being recruited by woody shrubs and grasses. Most importantly, natural ephemerals that are associated with a wild and scenic river would be affected, such as the sound of water splashing over and around in-stream boulders.

To recap, I consider that the Morgan Gorge section of the Waitaha River is an outstanding natural feature that should be safeguarded from any future hydropower schemes.

I do not wish to be heard at the hearing.

Yours faithfully

19 OCT 2016

DEPT. OF CONSERVATION
WEST COAST

Director General
Department of Conservation
Private Bag 701
Hokitika 7842

Submission on Waitaha River - Proposed
Hydro Scheme.

is adamantly opposed
to any proposal to disturb the wild nature
of the Waitaha River. It is a scenic gem;
especially in its lower gorges and upper
reaches. The writer ^{of this submission} has walked to near its
source and love its wildness character.
It is a significant habitat for Whio. we
request it be left in its natural state and
ask to be heard at any hearing on this
matter.

yours truly

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT
CONCESSIONS****TO: Director-General****Department of Conservation****Private Bag 701****Hokitika 7842****Attention: Pauline Adams, permissionshokitika@doc.govt.nz****SUBMITTER:****ADDRESS FOR SERVICE:****CONCESSION APPLICANT DETAILS:****Applicant's name: Westpower Limited****Proposal: Waitaha Hydro Scheme****Details of application:**

The applicant wishes to obtain a concession to construct, maintain and operate a run-of-the-river hydro scheme at the Morgan Gorge on the Waitaha River on Department of Conservation (DOC) stewardship land. Westpower propose to take water off through a highly visible weir across the river and tunnel entrance located in the rock face on the true right bank at the start of the Morgan Gorge. This structure and an adjacent access tunnel portal will be significant industrial intrusions into an otherwise pristine landscape and environment. The scheme proposes to take much of the flow of the river (up to 23 cumecs, river median flow (50% of the time) is 19 cumecs) and leave a residual flow of 3.5 cumecs in the Morgan Gorge at all times – higher and flood flows will still travel down the Morgan Gorge when the proposed Westpower take is exceeded. The water is returned to the river about 2.5 km downstream of the intake via a powerhouse on the north bank of the river.

The reach of the Waitaha River that is of particular concern with respect to the current requested concession is from the powerhouse site upstream to the headwaters of the Waitaha River, and including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

I wish to be heard in support of this submission, however logistically from the North Island this is unlikely – but there are LOTS of people who would be willing, I request you don't deny people this opportunity!

Introduction

The Morgan Gorge on the Waitaha River, and the Upper Waitaha River including the Waitaha and Windhover Gorges and catchment to the main divide constitute an outstanding wild and scenic river, with outstanding natural beauty, scenery and wilderness values, and outstanding kayaking values for expert and developing kayakers. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers. Therefore, like their exemplars of other outstanding beginner, intermediate, advanced and expert white water runs water throughout the country, some of which are protected by Water Conservation Orders, this river warrants the same statutory recognition and protection.

The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

Request Declining the Granting of the Concession

I request that the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River be reversed and that the concession not be granted as the proposed development:

* Speaking from someone who is highly effected currently in my career as an outdoor educator in Central North Island. I can understand first hand the potential implications of this scheme – the rivers will NEVER be the same. The quality (in many facets), the wildlife, the whole-hearted enjoyment of kiwis and travelers alike will be negatively impacted.

- * We are in a position as a nation to lead in the sustainability of the people, the land and everything encompassing. Having a detrimental impact on a currently pristine paradise that is open to all and free of tainted terrain – it's just not worth it...
- * Will impact severely on the natural feature and wilderness and scenic values of the spectacular, powerful, majestic, water carved, fluted, schist rock Morgan Gorge, which separates the upper wild and scenic Waitaha back country catchment from the front country, as well as the whole catchment
- * is incompatible with the outstanding natural feature (ONF) status of the Morgan Gorge and outstanding natural landscape (ONL) status of the Waitaha River from the bottom of the Morgan Gorge to the headwaters and values of the stewardship land involved
- * is incompatible with the purpose of the Conservation Act, and especially with respect to the purpose of DOC stewardship land
- * is not needed for the power it will generate, nor would it provide for greater reliability of power distribution for the West Coast
- * is contrary to various Objectives and Policies in Regional and District Plans and the West Coast Conservation Management Strategy
- * will prevent current recreational users and particularly kayakers from accessing the Morgan Gorge and a river reach below
- * will severely impinge and intrude on the outstanding kayaking, white water, wilderness and landscape values of a wild and scenic West Coast river. The proposed scheme will have a significant adverse effect on the outstanding kayaking values in the river. Such issues are not properly addressed in the application
- * the mitigation offered if the scheme goes ahead is not sufficient, workable, or appropriate. This concession without appropriate consent conditions will effectively stop kayakers using the resource, not just in the Morgan Gorge but elsewhere in the catchment, where no mitigation is provided
- * New Zealand is swamped with power generation, there are plenty of other less damaging consented power schemes and infrastructure on the West Coast available to provide power, MBIE say we don't need the power, so if this extra generation is not needed why ruin the beautiful wild Waitaha River?

*** does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!**

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower – not only for us the people but for the land and the generations to come. Community and a close relationship with the land can enrich lives beyond all materialistic wealth and technological advance. Be brave enough to lead the way. Please.

Lucy Croft

From:
Sent:
To: Wednesday, 19 October 2016 3:41
Subject: p.m. Permissions Hokitika
re potential Hydro Scheme Westpower
Importance: High

To Whom It May Concern

I support the concession by Westpower for the Waitaha area.

I am familiar with their work in other places of the West Coast and feel that they are environmentally aware, prepared to work with local people and interested parties, and common sense in their approach to smaller power generation styles.

The Hari Hari scheme is quite recent, gave work to locals, avoided significant trees and is sensitive to the upper reaches of the Amethyst and what lives there.

Given that Westpower has offered kayakers days that they (kayakers) can chose when no water will be drawn by the company, then I feel that is a more than reasonable compromise.

The upper reaches of this river were not successfully kayaked until a concession was applied for and since then only a very few people have done this.

It is not reasonable to hold up something which benefits many people for a few who now want to kayak this.

I believe the kayakers are catered for.

I commend Westpowers consistently sensitive approach to generating power through using minimal intake.

regards,

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:

ADDRESS FOR SERVICE:

CONCESSION APPLICANT DETAILS:

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

Details of application:

The applicant wishes to obtain a concession to construct, maintain and operate a run-of-the-river hydro scheme at the Morgan Gorge on the Waitaha River on Department of Conservation (DOC) stewardship land. Westpower propose to take water off through a highly visible weir across the river and tunnel entrance located in the rock face on the true right bank at the start of the Morgan Gorge. This structure and an adjacent access tunnel portal will be significant industrial intrusions into an otherwise pristine landscape and environment. The scheme proposes to take much of the flow of the river (up to 23 cumecs, river median flow (50% of the time) is 19 cumecs) and leave a residual flow of 3.5 cumecs in the Morgan Gorge at all times – higher and flood flows will still travel down the Morgan Gorge when the proposed Westpower take is exceeded. The water is returned to the river about 2.5 km downstream of the intake via a powerhouse on the north bank of the river.

The reach of the Waitaha River that is of particular concern with respect to the current requested concession is from the powerhouse site upstream to the headwaters of the Waitaha River, and including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

Introduction

The Morgan Gorge on the Waitaha River, and the Upper Waitaha River including the Waitaha and Windhover Gorges and catchment to the main divide constitute an outstanding wild and scenic river, with outstanding natural beauty, scenery and wilderness values, and outstanding kayaking values for expert and developing kayakers. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers. Therefore, like their exemplars of other outstanding beginner, intermediate, advanced and expert white water runs water throughout the country, some of which are protected by Water Conservation Orders, this river warrants the same statutory recognition and protection.

The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

Request Declining the Granting of the Concession

I request that the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River be reversed and that the concession not be granted as the proposed development:

- will impact severely on the natural feature and wilderness and scenic values of the spectacular, powerful, majestic, water carved, fluted, schist rock Morgan Gorge, which separates the upper wild and scenic Waitaha back country catchment from the front country, as well as the whole catchment
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- the mitigation offered if the scheme goes ahead is not sufficient, workable, or appropriate. This concession without appropriate consent conditions will effectively stop kayakers using the resource, not just in the Morgan Gorge but elsewhere in the catchment, where no mitigation is provided
- New Zealand is swamped with power generation, there are plenty of other less damaging consented power schemes and infrastructure on the West Coast available to provide power, MBIE say we don't need the power, so if this extra generation is not needed why ruin the beautiful wild Waitaha River?
- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!
- I have explored many of the West Coast rivers and it is very frustrating and disappointing to think my children will not be able to experience places such as the Morgan Gorge in its current form too.

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 21, 2016

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

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"We do not inherit the Earth from our Ancestors, we borrow it from our Children" – Indian proverb.

I believe that means we don't have the right to alter iconic and pristine New Zealand landscapes such as the Waitaha River when it is neither needed or wanted.

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 21, 2016

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- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!

This submission is being made because the pristine wilderness, and world renowned white-water, is what originally drew me to New Zealand. The thought of these natural assets being unnecessarily destroyed is abhorrent, and goes against the principles of New Zealand and its people. I have volunteered for St. John Ambulance crews, and now work in Health and Safety, to protect the people of this country, and would like to see this country protected as well, as is the responsibility of government, and especially the Department of Conservation.

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 16, 2016

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842
Attention: Pauline Adams
permissionshokitika@doc.govt.nz

19 October 2016

Submission on the Minister of Conservation's intention to grant a lease, licence and easement concession for a term of 49 years under section 17Q of the Conservation Act 1987 to Westpower Limited to construct and operate a run of the river hydro scheme on the Waitaha River on the West Coast

I oppose the application by Westpower Ltd to construct a run of the river hydro scheme on the Waitaha River on the following grounds:

- While a run of the river scheme may be a low carbon energy production method this benefit does not outweigh other serious environmental effects.
- Effects to the natural functioning of the river (integral to its natural character value) from reducing the natural water flow regime cannot be mitigated and must be avoided.
- There are much better alternatives to produce power for west coast communities that do not require adversely affecting a valuable community resource such as the Morgan Gorge within the Waitaha River. These include alternative methods such as solar and wind power.
- Wild rivers are non-renewable and a rare resource. It is imperative that New Zealand protect our remaining wild rivers (i.e. those who flows, channel and riparian margins have not been affected by human development) for future generations.

The granting of this concession is contrary to the Conservation Act (1987) and the interests of the New Zealand public.

In summary, it is not acceptable to degrade the Outstanding Natural Character of this particular river. Such a scheme would be acceptable where there were no Threatened or At Risk species present, the river was already degraded from its natural state and recreational and scenic values were low.

I request this application is declined by the Minister of Conservation. Thank you for the opportunity to submit my views. I do not wish to be heard at the hearing.

Yours sincerely

CONSERVATION ACT 1987 SECTION 17Q**SUBMISSION/OBJECTION ON/TO AN INTENTION TO GRANT CONCESSIONS**

TO: Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Attention: Pauline Adams, permissionshokitika@doc.govt.nz

SUBMITTER:**ADDRESS FOR SERVICE:****CONCESSION APPLICANT DETAILS:**

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

Details of application:

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requested concession is from the powerhouse site upstream to the headwaters of the Waitaha River, and including the Morgan Gorge.

SUBMISSION/OBJECTION:

I oppose and object to the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River.

I wish to be heard in support of this submission.

Introduction

The Morgan Gorge on the Waitaha River, and the Upper Waitaha River including the Waitaha and Windhover Gorges and catchment to the main divide constitute an outstanding wild and scenic river, with outstanding natural beauty, scenery and wilderness values, and outstanding kayaking values for expert and developing kayakers. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers. Therefore, like their exemplars of other outstanding beginner, intermediate, advanced and expert white water runs water throughout the country, some of which are protected by Water Conservation Orders, this river warrants the same statutory recognition and protection.

The proposed Westpower hydro scheme will have a number of significant impacts on the values of the Morgan Gorge, the river above, and a section of the river below the Morgan Gorge, that are currently used by kayakers and other back country recreation users.

Request Declining the Granting of the Concession

I request that the Minister of Conservation's intention to grant a concession to Westpower Ltd to construct and operate a hydro scheme on the Waitaha River be reversed and that the concession not be granted as the proposed development:

- will impact severely on the natural feature and wilderness and scenic values of the spectacular, powerful, majestic, water carved, fluted, schist rock Morgan Gorge, which separates the upper wild and scenic Waitaha back country catchment from the front country, as well as the whole catchment
- is incompatible with the outstanding natural feature (ONF) status of the Morgan Gorge and outstanding natural landscape (ONL) status of the Waitaha River from the bottom of the Morgan Gorge to the headwaters and values of the stewardship land involved
- is incompatible with the purpose of the Conservation Act, and especially with respect to the purpose of DOC stewardship land
- is not needed for the power it will generate, nor would it provide for greater reliability of power distribution for the West Coast
- is contrary to various Objectives and Policies in Regional and District Plans and the West Coast Conservation Management Strategy
- will prevent current recreational users and particularly kayakers from accessing the

Morgan Gorge and a river reach below

- will severely impinge and intrude on the outstanding kayaking, white water, wilderness and landscape values of a wild and scenic West Coast river. The proposed scheme will have a significant adverse effect on the outstanding kayaking values in the river. Such issues are not properly addressed in the application
- the mitigation offered if the scheme goes ahead is not sufficient, workable, or appropriate. This concession without appropriate consent conditions will effectively stop kayakers using the resource, not just in the Morgan Gorge but elsewhere in the catchment, where no mitigation is provided
- New Zealand is swamped with power generation, there are plenty of other less damaging consented power schemes and infrastructure on the West Coast available to provide power, MBIE say we don't need the power, so if this extra generation is not needed why ruin the beautiful wild Waitaha River?
- does not make sense, there is no need to destroy this pristine wilderness river for the sake of power generation that is not needed, don't do it!

For these reasons I ask that the decision on the concession application be reversed and that the Minister decline granting the concession to Westpower.

Date: October 19, 2016

Submission on Waitaha River Hydro Scheme Proposal

October 20, 2016

Dear Lou Sanson, Pauline Adams, Hon Maggie Barry, Hon Nicky Wagner, and all to whom it may concern,

Please do not allow a Waitaha River Hydro Scheme to go ahead.

I am a professional photographer and recently ventured up the Waitaha to photograph Kiwi Flat and Morgan Gorge. Prior to this I have spent a lifetime exploring Westland's river valleys. But I have not seen any location as wild as Morgan Gorge.

While photographing the gorge I walked and abseiled into the canyon in several spots. It is a place that belies belief and ranks amongst the most beautiful and dramatic locations in New Zealand. The roar of the water running through sculptured schist walls is deafening. To silence Morgan Gorge would be a travesty of conservation, a tragedy and a crime against nature.

Kiwi flat is a haven for trampers who venture off the beaten track. Its tranquillity is a stark contrast to the dramatic gorge below. The river flat is the gateway into the upper Waitaha and Ivory Lake. It takes a full day to reach for moderately fit trampers and is wilderness in all but its legal classification. The proposed workers' camp and noise from machinery and blasting would destroy the wilderness feel of this location and the permanent structures left behind would take away from the unspoilt nature of the river flat and gorge.

An independent report researched by Tony Baldwin shows that there is currently no demand for the electricity this scheme will generate and if or when it becomes economically viable, there is a more suitable alternative already with resource consent for the Arnold River just to the north. It is important to point out that the Arnold River is already highly modified by hydro development and farming and as such is a more suitable location for development.

As there is no demand for the electricity this scheme would create, it appears that the concept is motivated simply by human greed.

Reasons why DOC should not allow this scheme to go ahead:

1. Environmental threats from the Westpower Ltd Hydro Scheme:

- ***The scheme will threaten blue duck (whio) known to live and breed at Kiwi Flat.***

Both the river flat and Morgan Gorge are home to the threatened (nationally vulnerable) endemic blue duck (I have witnessed blue duck inside Morgan Gorge).

DOC's web page on blue duck lists **habitat loss and human disturbance** as two of the **main threats** to the species survival. Why then would the Department of Conservation allow development on one of the few rivers in the country still free of human disturbance and with a fully intact habitat? This scheme would greatly affect the habitat of blue ducks who live at Kiwi Flat and Morgan Gorge.

The constant helicopter traffic flying machinery and workers into the site would, alone, make Kiwi Flat untenable for blue ducks. Furthermore, the rock blasting, and heavy machinery operating would also make this location untenable for blue ducks.

The *Whio/Blue Duck Recovery Plan 2009-2019* lists hydro as a threat to all life stages of the bird. **DOC have an obligation to protect the Blue Duck and their undisturbed habitat.**

I find it ironic that DOC spends many millions of dollars on blue duck recovery each year and then intends to grant concession for this scheme, which will destroy an important piece of pristine blue duck habitat; it is madness.

References:

<http://www.doc.govt.nz/nature/native-animals/birds/birds-a-z/blue-duck-whio/threats/>.

<http://www.doc.govt.nz/Documents/science-and-technical/tsrp62entire.pdf>

- Other threatened and at risk species such as long-tailed bat and grey duck are known to inhabit the area. **The more we fragment large scale ecosystems and introduce man-made structures, activity and noise and reduce vegetation cover, the more stress and pressure we put on our native species –we reduce their breeding and feeding areas and we cause them undue stress that interferes with their breeding and lifecycle.**
- **Introduction of pest plant species.** Equipment used for the project may introduce pest plant species through seeds brought in on tires and tracks.

I saw no gorse at Kiwi Flat (above the gorge) when I was there in September 2016 but it was extensive on the flat below the gorge where cattle were grazing in and out of the river.

2. Recreational threats of the Westpower Ltd Hydro Scheme:

- The Waitaha River offers a remote tramping experience. The hydro scheme will greatly damage the 'wilderness' feel of Kiwi Flat and the trip to Ivory Lake as a whole.
- The voice of the river that tumbles through Morgan Gorge will be all but silenced. Trampers who venture into the area would never again hear the roar of Morgan Gorge below them.
- There is a world-class hot pool in the lower end of Morgan Gorge (at the confluence of Glamour Glen). To reach it requires a rock scramble down the gorge wall. Sitting in a remote hot pool a metre above the class 5 rapids of the gorge is an experience likely found nowhere else on earth. This too would be lost.

3. Visual threats of the Westpower Ltd Hydro Scheme:

- The scheme will leave a lasting scar on the lower Waitaha River flat, at the entrance to Morgan Gorge – one of the most dramatic gorges in New Zealand – and at Kiwi Flat; this scar cannot be mitigated.

4. Other considerations:

- There is another nearby river, the Arnold, which would be better suited for a hydro scheme – a scheme has already been consented there and it is likely to generate more power than the Waitaha scheme. It is outside of public conservation land.

And finally perhaps the most important consideration for this land should be...

- The public conservation land status of the area Westpower wish to develop is currently 'stewardship land'. This is an area awaiting assessment and classification. Jan Wright, the Parliamentary Commissioner for the Environment, has made a case for prioritising stewardship land classification.

If this scheme goes ahead, the land leased to Westpower Ltd will forever lose its pristine nature and will likely never received the conservation upgrade it deserves through the stewardship land review process. With a hydro scheme and related developments it will not be upgradable to wilderness or national park classification and may altogether lose any level of protection, not to mention the level it currently deserves. How can this scheme be allowed to go ahead if the environmental status of the land is yet to be determined?

Reference:

<http://www.pce.parliament.nz/publications/investigating-the-future-of-conservation-the-case-of-stewardship-land>

In closing:

I believe the integrity of the Department of Conservation is in the balance. How can DOC give intention to grant this scheme knowing it will decrease blue duck habitat and introduce disturbance for all native plant and animal species in the area?

How can DOC give intention to grant this scheme before the environmental status of this land has been thoroughly reviewed?

The same office – Hokitika DOC – that formally announced the intention to grant this scheme also allowed the disastrous Pike River mine to go ahead. This scheme, like the Pike River mine, is not financially sound and if the scheme fails, which it almost certainly will, DOC and the tax payers will have to pick up the bill to restore the area from the damage done during construction.

Like Ruataniwha, if DOC backs this controversial scheme it will undermine DOC's credibility as a conservation organisation and set a precedent for future destruction of pristine natural areas.

Regards,

Lucy Croft

From:
Sent: Thursday, 20 October 2016 5:16 p.m.
To: Permissions Hokitika
Subject: Attention: Pauline Adams

I am opposed to the application by Westpower Limited for a Lease, Easement and License for a hydro scheme in the Waitaha River. I request that the Minister of Conservation decline the Application. I oppose the application because: The proposal does not meet the purpose of the Conservation Act. The proposal will have an irrevocable impact on the high natural values of this wild river. The mitigation proposed by Westpower will not mitigate the impacts of the intrusion of manmade structures and altered river flows on this landscape. This is a truly wild river and its intrinsic character that includes the native flora and fauna would be permanently destroyed by imposing a hydro scheme on public conservation land. The impacts on these values include: The intrinsic nature of the magnificent undisturbed river in South Westland. The Waitaha is an unobstructed wild river. There is wide agreement that it is an outstanding natural landscape. The Morgan Gorge is an outstanding natural feature and one of the most spectacular gorges in the country. The construction of a weir and associated infrastructure close to where the Waitaha enters the gorge will have an entirely unacceptable and inappropriate impact on the overwhelming naturalness of this special place.

The upper catchment of the Waitaha It is highly valued for its sense of remoteness by trampers and hunters alike and is considered to be of international significance for kayakers. There is no mitigation measures that can compensate for the change from an outstanding wild and remote experience in the upper Waitaha to what will be become a significantly modified and 'industrialised' environment as a result of the reduced river flow, weir and associated infrastructure. The values of the Waitaha are important in and of itself. Effects on significant flora and fauna habitat: The permanent loss of 3.5 ha of native forest with a reduction in the intactness of the vegetation. The removal of vegetation as a result of the proposal will cause the permanent loss of habitat for of lizard species at risk of extinction, including the green and forest gecko. Westpower has not adequately assessed the presence of these highly threatened species and have not given any assurance that the impacts on them can be properly avoided or mitigated. The proposal will result in the destruction of these nationally important species, any loss therefore is significant. Westpower has identified 27 native bird species with the hydro footprint, including a number of threatened native bird species. These include kaka, falcon and whio.

Westpower notes that western weka are recorded in the catchment. Western weka are genetically distinct from other populations of weka north of the Waitaha catchment. There is insufficient information about the impacts of the resident whio population, including the importance of the Morgan Gorge to them. There can be no confidence that Westpower is able to avoid, remedy or mitigate impacts on this iconic species, including the impacts of construction and the dewatering of the Morgan Gorge. The long tailed bat is present within the footprint. The clearance of habitat and tree felling will result in loss of both their breeding and feeding habitat and has the potential to cause the death of bats. This is an entirely unacceptable and inappropriate risk and one that cannot be adequately mitigated for.

Furthermore, there are already other alternatives for hydro generation on the West Coast. There are already consented proposals for hydro including the schemes on the Arnold River and at Stockton. There is no case for further hydro generation that justifies the destruction of such a wild and special place.

Yours,

Lucy Croft

From:
Sent: Thursday, 20 October 2016 5:43 p.m.
To: Permissions Hokitika
Subject: Attention: Pauline Adams

I am opposed to the application by Westpower Limited for a Lease, Easement and License for a hydro scheme in the Waitaha River. I request that the Minister of Conservation decline the Application. I oppose the application because: The proposal does not meet the purpose of the Conservation Act. The proposal will have an irrevocable impact on the high natural values of this wild river. The mitigation proposed by Westpower will not mitigate the impacts of the intrusion of manmade structures and altered river flows on this landscape. This is a truly wild river and its intrinsic character that includes the native flora and fauna would be permanently destroyed by imposing a hydro scheme on public conservation land. The impacts on these values include: The intrinsic nature of the magnificent undisturbed river in South Westland. The Waitaha is an unobstructed wild river. There is wide agreement that it is an outstanding natural landscape. The Morgan Gorge is an outstanding natural feature and one of the most spectacular gorges in the country. The construction of a weir and associated infrastructure close to where the Waitaha enters the gorge will have an entirely unacceptable and inappropriate impact on the overwhelming naturalness of this special place.

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Furthermore, there are already other alternatives for hydro generation on the West Coast. There are already consented proposals for hydro including the schemes on the Arnold River and at Stockton. There is no case for further hydro generation that justifies the destruction of such a wild and special place.

Yours,

Lucy Croft

From:
Sent: Friday, 21 October 2016 9:08 a.m.
To: Permissions Hokitika
Subject: Attention: Pauline Adams

Although I am currently residing in Christchurch, I was born in Karamea and have a bush property on the banks of the Taramakau River. I am a very keen trumper in the West Coast region and have ventured into practically all the river valleys in the area. I have tramped up the Waitaha several times and consider the area a very special region of NZ. On my last trip into the area I was fortunate to see several pairs of whio, which is an increasingly rare sight in our backcountry. My trips into Lake Ivory are amongst the best that I have experienced in over 40 years of tramping. The unspoiled wild-ness of the Waitaha is a treasure that needs to be protected for future generations, rather than exploited for immediate commercial gain.

I am opposed to the application by Westpower Limited for a Lease, Easement and License for a hydro scheme in the Waitaha River. I request that the Minister of Conservation decline the Application. I oppose the application because: The proposal does not meet the purpose of the Conservation Act. The proposal will have an irrevocable impact on the high natural values of this wild river. The mitigation proposed by Westpower will not mitigate the impacts of the intrusion of manmade structures and altered river flows on this landscape. This is a truly wild river and its intrinsic character that includes the native flora and fauna would be permanently destroyed by imposing a hydro scheme on public conservation land. The impacts on these values include: The intrinsic nature of the magnificent undisturbed river in South Westland. The Waitaha is an unobstructed wild river. There is wide agreement that it is an outstanding natural landscape. The Morgan Gorge is an outstanding natural feature and one of the most spectacular gorges in the country. The construction of a weir and associated infrastructure close to where the Waitaha enters the gorge will have an entirely unacceptable and inappropriate impact on the overwhelming naturalness of this special place.

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Furthermore, there are already other alternatives for hydro generation on the West Coast. There are already consented proposals for hydro including the schemes on the Arnold River and at Stockton. There is no case for further hydro generation that justifies the destruction of such a wild and special place.

Yours,

Lucy Croft

From:
Sent: Friday, 21 October 2016 9:15
To: a.m. Permissions Hokitika
Subject: NO! to Waitaha Hydro Proposal

Dear Pauline,

I'm a New Zealander living in Austria, running whitewater tours and producing a water craft called the The river we operate on (the Salza) is one of the few remaining rivers with unbroken stretches of whitewater in the European Alps. We are extremely lucky, as sadly the trend in Austria is ever increasing pressure for hydro development on the few remaining wild river, which if successful will see large stretches of these last remaining beautiful free flowing rivers laid dry.

Having seen first hand the impact of hydro schemes so many beautiful alpine valleys in the European Alps, I am saddened to see New Zealands' rivers coming under a similar threat. There are plenty of viable alternatives to generate electricity – such as wind, or solar, which have much less impact on the environment as hydro. The Waitaha is a wild and pristine valley and should be allowed to remain so for generations to come. Hopefully common sense will prevail! The Waitara Hydro Scheme **MUST BE DECLINED!**

best regards