

Lucy Croft

From:
Sent: Friday, 21 October 2016 12:52 p.m.
To: Permissions Hokitika
Subject: Waitaha Hydro Scheme

Submission in support of the Waitaha Hydro Scheme

As a long term resident of South Westland i would like to support the proposed Waitaha run of the river power scheme.

I have witnessed the benefits and the low environmental impact that the Amethyst Scheme has had at Hari Hari and believe that this new one will be no different given that the same parties are involved in construction.

The boost to the local economy of such a scheme will be tremendous. Initially in accommodation, jobs, support structure in the construction phase but the lasting insurance of a sustainable reliable supply to the farming and tourism industry of South Westland can not be over emphasised.

I believe the objections from the kayaking community are largely overstated and can be accommodated for theis\r scheme as it will not affect the water above Kiwi Flat and the extreme water of the Morgan George has very rarely been successfully kayaked. Westpower are prepared to accommodate them if they are willing to negotiate.

Similarly the current access to the Waitaha Valley will not be affected in any way and it is difficult to see how this will impact on the tramping fraternity.

I am one of the few people who has visited the Valley in recent times and can assure the Department that while Kiwi Flat hut gets light traffic, others such as the Ivory Lake and Scamper Torrent are almost never visited.

I believe that the benefits of the scheme far outweigh any perceived negative impacts and I fully support the Department in granting Consent for this project to proceed.

I do not want to speak to this submission,

Yours faithfully,

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
- 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!

Having kayaked on the west coast I have a first hand experience of just how truly world class and wild our rivers are. Why intentionally damage them when there is no need? It seems these decisions are made by people who have no connection with these places. How can they make calls as to how valuable a resource is when they don't know them as intimately as the people trying so hard to protect them? Go see for yourself, the Waitaha valley is truly remarkable.

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 27, 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:**

Address 1

Address 2

CONCESSION APPLICANT DETAILS:

Applicant's name: Westpower Limited

Proposal: Waitaha Hydro Scheme

Details of application:

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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

"Water is the very essence of ourselves, moko, that we cannot do without, and that we have to treasure all of our lives, for that is where we join with our ancestor Ranginui, in his love for Papatuanuku" ~ Whispers of Waitaha.

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, and holds high cultural values.

The natural world to Waitaha is seen from a holistic view point. It consists of environmental understanding of processes, cycles and seasons which if interfered with, has a high risk of permanent damage and thus, a loss of Mana. This is old knowledge, and of course many understand this today, however, many others refuse to accept it believing change can be minimal, mitigated, and for the better. We cannot see how this proposal could be any of these three.

Waitaha Perspective

Within the natural functions of our landscape, rivers are the physical cleaning system of our earth, flushing out debris and silt build up during flood and creating clean, life providing water for humans, birds, fish and invertebrates and keeping the life force cycle healthy and sustainable.

"The awa are Papatuanuku's viens providing her nourishment and they are cleansed in the floods and the hupe is flushed out" ~ Tumuaiki o Waitaha Taiwhenua o Waitaki, Ann Dodds.

The natural world is also seen as more than it's physical being. Water, rock, forest, animals are all seen as the life force, they are seen to have Mana and Mauri, and to tamper with your life force is to bring about a negative outcome. This spiritual connection to nature is strong and Godly and helps us as humans to deeply connect to and look after our environment, to have respect for our Grandmother Earth, and up hold the life force of Papatuanuku.

"Toku Awa, ko toku ora. Toku awa, ko toku mana. Toku awa, ko toku kaha. Toku awa, ko toku wai rua. *My river, is my life. My river, is my authority. My river, is my power. My river, is my double spirit.*" ~ Whispers of Waitaha.

When Maui came to Aotearoa in search for the Birth Place of the Gods, he found it, in the middle of the South Island. Here is where he made the ultimate Covenant with Papatuanuku asking to allow his people to live here. The agreement is that humans could live here in Peace and had to look after the lands, waters, birds, forests and fish. We as Waitaha, the descendants of our Poua Maui and Tangatawhenua o Mahunui, hold this Agreement as current and continuing. As Manuhiri, Westpower LTD have no authority to change or impact the landscape and must adhere to this lore of the whenua.

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, and construction of the proposed will impinge on this natural system so is deemed unwanted by Waitaha.

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:

1. will diminish the Mana and Mauri, spiritual connections, of this river which values are to be upheld within the **Treaty of Waitangi**.
2. As indigenous Waitaha descendants and Waitaha people, the river has our Peoples name to it. This is to show how great it's Mana, and to help continue the knowledge and stories of Peace. And to change and impact the river in this way is offensive and disrespectful to the history of the river and to all People of the past, us now and to those in the future.
3. Will go against Aotearoa's longest standing Covenant between people and the earth, Maui's Sacred Promise.
4. 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
5. 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
6. is incompatible with the purpose of the Conservation Act, and especially with respect to the purpose of DOC stewardship land
7. is not needed for the power it will generate, nor would it provide for greater reliability of power distribution for the West Coast
8. is contrary to various Objectives and Policies in Regional and District Plans and the West Coast Conservation Management Strategy
9. will prevent current recreational users and particularly kayakers from accessing the Morgan Gorge and a river reach below
10. will severely impinge and intrude on the outstanding kayaking, white water, wilderness and landscape and cultural 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

11. 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
12. 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?
13. 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! Many alternative options for power generation are here and being developed.

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 27, 2016

Lucy Croft

From:
Sent: Saturday, 22 October 2016 9:38 a.m.
To: Permissions Hokitika
Subject: Submission on WestPower Ltd's hydro proposal for the Waitaha River

Giddy I have heard through whitewater New Zealand that there are plans for new hydro electric generation on the waitaha river. This is great news, the move away from carbon based fuels to a sustainable future requires lots of renewable energy like this. The change from petrol to electric vehicles will greatly increase the need for electricity, to have the Department of Conservation playing its part in this change seems sensible to me. New Dams like this are both good for the economy giving new jobs and reducing our need for imported fossil fuels as well as being environmentally friendly.

Lucy Croft

From: Saturday, 22 October 2016 9:55 p.m.
Sent: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
To: Attention: Pauline Adams
Subject:

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 live in the Waitaha Catchment, My business is Paramata Lodge which we built and live in and which looks to the mountains of this upper catchment and the lower valley with the gorges of the Waitaha River to the south west of us.

All our views are magnificent and made up of intact natural public conservation land although we are in a forest clearing by the sea of the lower Waitaha Valley which was lowland kahikatea wetland forest on the coastal flat land. The Kakapotahi Ecological Area almost entirely surrounds us and this areas has the most northern remaining original (300-400 Year old) kahikatea trees still standing adjacent to the beach, with the gorges of the Waitaha Valley behind. We are also only 30 ,mintes drive to Hokitika. For the reasons of this natural environment and the proximity to Hokitika and to Christchurch (3 and half hours drive) we chose this location to begin our very successful business and a sustainable lifestyle we are proud of.

We have proven in 8 years that tourists want to see our New Zealand lifestyle
- designed and built by us for this site, comfortable accommodation surrounded by nature and hosts that understand and interpret the science and natural history of the environment. It is special here surrounded by largely intact natural scenes from ancient forest, nationally significant coastal wetlands and miles of remote sandy coastline. We have a concession with the DOC to guide visitors into public conservation land in the surrounding area and we need to keep it intact and protected from development of this kind in order to be sincere and honest about what is here, how New Zealanders have treated the land and what we are doing now to protect it for future generations to appreciate and learn from with science.

We are not impoverished as a national and so we don't need to exploit nature for all of us to survive very very successfully. But we do have to think and make smarter decisions than this one.

I oppose the application because: The proposal does not meet the purpose of the Conservation Act. It will destroy a significant natural place and it is unthinkable and I believe unlawful for DOC to agree to de-water the Morgan Gorge. I know this place and I speak from the heart as well as logical thinking. I simply can't understand how you could even entertain this.

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: Saturday, 22 October 2016 11:00 p.m.
To: Permissions Hokitika
Subject: Objection to; "Intention to grant a run of the river hydro scheme concession to Westpower Limited"

To the Director-General, Department of Conservation,

This is a formal objection to the "*Intention to grant a run of the river hydro scheme concession to Westpower Limited*". I am a tertiary student, three weeks away from completing a Diploma in Outdoor Recreation and Instruction at Hillary Outdoors Education Centre, Tongariro.

My objection is concerned foremost with the **Effects on Recreation and Tourism Values** - specifically the impacts on white water kayakers. It appears that Westpower's construction of a 20MW hydro-electric power scheme on the Morgan Gorge section of the Waitaha river cannot guarantee the opportunity for white water kayakers to paddle this section of river in the Morgan Gorge and below in the Waitaha Gorge.

Also, the construction of this power scheme, while apparently necessary for the local communities' power supply needs, is not validated by Westpower as necessary to occur in the Waitaha River for any particular reason. In fact, the impression that one is left with after reading Westpower's comments to various reports and notably the Concession Officer's Report, is that this river has been chosen on the basis of their own self-interests, with an after-thought to the river itself, the ecology that depend upon that river and the prior users of this river (such as white water kayakers).

Westpower consistently fails to comment on why they have chose the Waitaha River as the location for their hydro-electric power scheme. Westpower comments that they have spent ten years researching possible locations across the entire South Island for the best location to construct this scheme. They do not indicate who this location is "best" for. Furthermore, the suggestions of alternative locations for this scheme which may lie outside of DOC land or even other locations inside DOC land have been flatly ignored by Westpower to comment on.

This project should not be allowed to go ahead in the Waitaha River when there are clearly other available options for such a project, even if they are less convenient for Westpower.

Sincerely,

Lucy Croft

From:
Sent: Tuesday, 25 October 2016 1:04 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Subject: Attn: Pauline Adams

I grew up in a place with a beautiful river. I learned to appreciate the magic of wild rivers in NZ. This is why I ask you now: please oppose 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.

The proposal does not meet the purpose of the Conservation Act. It will have an irrevocable impact on the river. Westpower's mitigation proposal is insufficient.

The intrinsic character of Waitaha River, including its native flora and fauna, would be destroyed by a hydro scheme. The scheme would:

- * Damage the unobstructed and wild magnificance of the Waitaha.
- * Compromise an outstanding natural landscape.
- * Harm the Morgan Gorge.
- * Destroy the remote feel of the upper catchment of the Waitaha
- * Destroy 3.5 ha of native forest and reduce the intactness of the vegetation.
- * Erase the habitat of lizard species at risk of extinction, including the green and forest gecko
- * Cause harm to the distinct Western weka.
- * Reduce the breeding and feeding habitat of local bats.

There are other alternatives for hydro generation on the West Coast, including 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.

Please do not allow Westpower to harm the wild Waitaha river.

Yours,

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

SUBMITTER:

ADDRESS FOR SERVICE:

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SUBMISSION/OBJECTION:

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Introduction

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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.

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
- 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!

I am a 30 y/o kiwi male. I am an avid kayaker, hunter, mountaineer and general outdoors lover. My main three passions in the outdoors are all contained with in the Waitaha river catchment and can be utilized year round in a pristine untouched wilderness setting. To have such a public asset stripped of it's pristine wilderness status under the guise of "needed power generation" is both a tragedy an embarrassment. With multiple unused and fully consented hydro schemes on the coast already and MBIE stating this power is not needed I feel let down as a Kiwi and voter.

I live in NZ as I believe we as a country stand for something greater than frugle destruction and exploitation of our wilderness. We market ourselves relentlessly as "clean green" and "100% pure", if you allow this project to proceed you are truly letting yourself and us as a nation down! You will taking from us what we claim to the world to be truly precious worthy of a trip down under!

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: 25/10/2016

Lucy Croft

From:
Sent: Wednesday, 26 October 2016 7:47 a.m.
To: Permissions Hokitika
Subject: Waitaha River

Hi Pauline,

I would like to go on record in opposition of the proposed plans for a hydro scheme on the Waitaha River, West Coast NZ.

Hydro power is an old fashioned way of producing energy. It's detrimental effects are only being seen years later when the natural systems that are affected, finally become apparent to humans. Why cause irreversible damage to such an amazing and wild landscape when there are other methods of producing what we like to call 'green energy'?

Hydropower schemes need to be re thought.

Natural landscapes must be protected, to allow NZ to retain it's identity as the wild and green natural paradise that it currently is. One day, I dream of taking my children through these West Coast gorges/walking tracks. It would be a crying shame if they where flooded by an unsustainable power source.

Kind regards,

Lucy Croft

From:
Sent: Friday, 21 October 2016 8:38 a.m.
To: Permissions Hokitika
Subject: Submission20WestPower Ltd's20proposal20the20River

To those concerned.

I totally endorse all that is stated by WhiteWater NZ regarding the proposed hydro scheme on the Waihaha River.

We do not need more power generation.

We do not need more wild rivers destroyed.

Regards

Lucy Croft

From:
Sent: Tuesday, 25 October 2016 10:26 p.m.
To: Permissions Hokitika
Subject: Waitaha Dam proposal

To whom it may concern,

The proposed dam for the Morgans gorge section of the Waitaha River is an utter disgrace. Why are we even considering destroying one of the most wild and serene parts of our country for a measly amount of power. I have personally spent time in this area and would be unbelievably devastated if anything was to happen to this part of my West Coast.

If this proposal goes ahead, action will take place on the ground by myself and others to prevent our wild areas from being destroyed. This will not be tolerated.

Regards,

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Lucy Croft

From:
Sent: Tuesday, 25 October 2016 10:29
To: p.m. Permissions Hokitika
Subject: Waipahu power scheme

I fully support the proposed power scheme any development of a renewable power source has got to be good for the region and country.

Sent from Samsung tablet.

Lucy Croft

From:
Sent: Wednesday, 26 October 2016 6:07 a.m. Permissions
To: Hokitika
Subject: Hydro scheme

Pauline Adams,

Although I am not a native Kiwi, I consider New Zealand a second home and a place I truly grew up and found my individuality. I studied abroad in 2009 at the University of Canterbury and my life has not been the same since. While living abroad I had the pleasure to meet some of my best friends and was introduced to the beautiful West Coast of New Zealand. Here I learned to kayak and took multiple backpacking treks. With each excursion and adventure I grew to understand the wilderness in a deeper level and appreciate the natural beauty in a way I had never looked at it before. I ask that you consider these pivotal moments when appraising the value of a hydro scheme on the Waitaha River. It is not just a river, but a gorge full of beauty and opportunity. Please keep the wilderness wild!

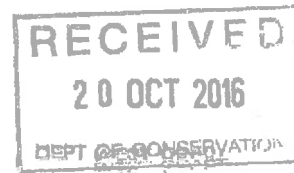
Thank you for your time,

Lucy Croft

From:
Sent: Wednesday, 26 October 2016 7:23 a.m.
To: Permissions Hokitika
Subject: Waitaha

This hydro dam plan is exactly the opposite of which way the world is going. Please do not destroy another river you cannot replace these things. It's disrespectful to the land and you will be cheating yourself in the long run. Why not tidal power? Or more wind turbines, these options are much better and easily removed if need be. Please save the river let it run free!!

Sent from my iPhone



231

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:

Your name:

Address:

Cell:

Email:

Introduction

I am an outdoor educator and guide and this is our teaching ground which will be taken away from us kiwis, I also hold a strong love for conservation and feel that the habitat for endangered species such as the Whio will be destroyed. I feel as though hydro schemes are destroying what little special areas New Zealand has to offer, Coming from Northland seeing the destruction Hydro schemes have on Native species and seeing it done on the West coast as well provides an incite to how New Zealand thinks about our Environment.

Submission

Westpower is seeking concessions in the form of leases, licenses and easements, and therefore under Part 3B of the Act the Minister must be satisfied the proposed activities are both appropriate and lawful.

Under Section 17 S (2) of the Conservation Act the minister is required to consider the financial viability of the proposal. Reservations about financial viability were one of five reasons given by the Minister for declining the Fiordland Monorail application in 2014.

The financial underpinning of the Westpower Waitaha Hydro Project appears to be based on predictions of power demand that are wildly at odds with many other forecasts (See Baldwin Report DOCCM 234-5375, p 22, DOC Concession Officers Report, Section 2.14), therefore casting what can only be considered significant doubt upon the financial model used by Westpower.

Given this significant doubt, it would be inappropriate in terms of 17S (2) of the Act to impose adverse effects on conservation values* in authorising such a project. To authorise a non-viable business with such effects would be inconsistent with the Act's purpose and the Minister would therefore be at error.

Under Section 17 U (4) (a) of the Conservation Act, the Minister is not able to grant a concession when they are satisfied the activity could reasonably be undertaken in another location that is outside the conservation area in question, or where the potential adverse effects would be significantly less.

Westpower's Waitaha application fails to address alternatives to the Waitaha Scheme which include;

1. Arnold River hydro scheme
2. Stockton mine and Stockton plateau hydro schemes

The suitability of these schemes as alternatives is discussed at length in Tony Baldwin's Report (DOCCM 234-5375, Section 13, DOC Concession Officers Report, Section 2.14). Each of these schemes is already fully consented and under section 17 U (4) (a) of the Act, the Minister is therefore not allowed to grant concessions for the activity proposed by Westpower in relation to the Waitaha scheme.

SUBMISSION:

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 request that the Intention to grant be reversed and that the concession not be granted on the basis of the discussion above.

I wish to be heard in support of this submission.

Name (printed)

Signature

Date

18/10/16

Links

Department of Conservation Concession Officers Report

Tony Baldwin Report

Conservation Act 1987 (Refer Part 3B, Section 17 S-U)

* "promote the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations."

Section 17S(2)

Where an applicant applies for—

- (a) a lease; or
- (b) a *profit à prendre* or a licence granting an interest in land; or
- (c) an easement;—

the applicant, in addition to supplying the information required by subsection (1), shall supply reasons for the request and sufficient information to satisfy the Minister, in terms of section 17U, that it is both appropriate to grant the lease, *profit à prendre*, licence, or easement and lawful to grant it.

Section 17U(4)(a)

The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing 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; or
 - (ii) 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; or

Submission - Waitaha River, Westland

Director General Department
of Conservation Private Bag
701
Hokitika 7842



Dear Sir/Madam,
I am writing on behalf of the

to express our concern at the proposal by Westpower to build a dam and hydro scheme on the Waitaha River in Westland.

There are very few rivers left in NZ, and indeed throughout the world, that can be considered "wild," that is not modified by people. Surely we should be doing everything we can to preserve those wild rivers that are left, especially if they are located within the DoC estate.

It is DoC's legal duty to preserve "outstanding landscapes" wherever they occur throughout New Zealand, to preserve the environment for its "intrinsic values" and to "safeguard the options of future generations." The Waitaha Valley, and Morgan Gorge in particular, qualify as areas of "outstanding natural features" and should be protected. Westpower's own landscape consultant says that the Morgan Gorge has "exceptional biophysical and perpetual features," and that the Waitaha Valley is home to several endangered species including the long tailed bat, whio, kaka, kea and native falcon.

As well, building new hydro schemes at this time is unnecessary. New Zealand has an oversupply of power generation and with increased efficiencies in the national grid and with improving alternative technologies, new schemes such as the Waitaha are uneconomic. It is interesting that Westpower say that the scheme is needed to "provide long term returns" for its shareholders. They are prepared to destroy an area of outstanding natural beauty, which is part of the DoC estate and therefore belongs to all New Zealanders, to provide economic gain for a small group of shareholders. A top white water kayaking river, outstanding landscapes and special habitats will provide much more reliable "long term returns" in activities such as tourism

We repeat that all New Zealanders are "shareholders" in DoC stewardship land and urge you not to grant permission for the Waitaha Scheme to proceed.

Yours faithfully

24 October 2016

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

Via E-mail permissionshokitika@doc.govt.nz

Westpower Limited – Concession Application – Waitaha River

Dear Mr Sanson

This letter serves as a written submission in relation to the application for a concession lodged with DOC by Westpower Ltd that seeks to authorise a hydro-electric power scheme on the Waitaha River.

This submission supports the concession application in its entirety.

The proposed works will provide for the following positive effects for the West Coast:

- Continued investment in infrastructure to support local industry and community needs
- Financial benefits through creation of construction and operational jobs.
- Development and provision of renewable energy sources.
- Increase in efficiency of provision of energy at decreased cost to consumers.

The application and proposed conditions associated with the permission are considered to be suitable for the protection of the existing environment, with the applicant providing a high level of information around avoidance and mitigation of actual and potential adverse effects.

Yours Sincerely

Director-General
□ Department of Conservation
□ Private Bag 701 □ Hokitika 7842

Attn Pauline Adams

Personal Submission on the Waitaha Hydro Proposal.

26th Oct 2017

I have travelled up and down the Waitaha Valley many times, and the ranges on both sides of it. In the last 10 years, along with other friends in Permolat, I have been actively involved in maintaining the tracks in the valley, including the County tributary. It is a wonderful place full of dramatic scenery.

I am disappointed with DOC's intention to grant a consent to remove water from a section of the Waitaha River. In Canterbury conservationists are trying to restore water to rivers, not continue the backward approach of removing it. That it should be DOC consenting to affect and reduce conservation value of the Morgan Gorge is sad. Doesn't sound like upholding conservation values to me.

On the plus side, Westpower is a local company. And hydro power doesn't produce greenhouse gases. However, I oppose the Scheme because of the effects on river life downstream, and also because of its effects on pre-existing user groups, including trampers, climbers, hunters and river paddlers. The Concession Officers report is very comprehensive, with some notable omissions around public access provision.

If this proposal does go ahead, there are some recreational bottom lines that need to be included in the consent. The first is enduring public access by vehicle to at least the edge of Conservation Land.

I note that DoC has sought a visual amenity report from Jeremy Head Landscape Architect Ltd, but I see little comment about whether anyone will ever be in a position to actually see the effects proposed, apart from on a computer, because access is currently so poor.

I also note that Boffa Miskell have produced a report on the Natural Character, Landscape and Visual Amenity Effects, commissioned by Westpower. The same applies.

This may be standard process but I am very concerned, having read right through the 190 pages of the Concession Officers report, that there is little substantive comment around the effects on the main users of the valley, trampers and hunters, and ways the scheme might be made to benefit those groups to mitigate against the intrusion of this power scheme into the valley. In fact the reports seem obsessed with the visual appearance of buildings and

works while doing almost nothing to facilitate the long standing access problem to the valley for the main users these past 50 years, trampers and hunters. Is DOC even interested in encouraging recreational use of the valley?

To my way of thinking, as the body charged with looking after recreation on conservation lands, DOC's primary concern here should be about access.

For years there had been a Mexican standoff between the farmer, DOC and the public on the true left where a long standing track was the standard access up the valley. This came to a head, and the department resolved the issue by making a longer, much poorer access via the true right bank, that involves the legal access skirting a private dairy farm on river boulders and bluffs (public land) for kilometres, to where a new but poor track starts at the edge of the gorge. So, in all respects, public access to the Waitaha valley has slowly been going backwards.

The department has a chance to improve access to our back country conservation lands with this concession application, and all I have read is the department passively accepting recreational access as being a 6km roadwalk. There doesn't even seem to be any legal long term public right guaranteed for that. This is completely unacceptable. On this basis, the Scheme should not proceed.

Westpower has presumably been able to negotiate 2 wheel drive access for its staff and contractors to the site of the power scheme. The least Westpower should be required to do is provide that same 2 wheeled drive access to a carpark beyond the farmland for the public. How they negotiate that would be up to them, but this should be a prerequisite for the department to insist on to offset recreation losses before considering the scheme. This would go some distance toward mitigating those recreational losses.

1. I seek that one of the conditions of any consent is that Westpower secure for the public the same access right it (and no doubt DOC) will enjoy, the right to drive along the access road to a carpark at least as far as Macgregor Creek, and preferably to within a kilometre of the power house area, with the road to be maintained by Westpower.

There is little extra cost in this proposal, but it would make a significant difference to valley users, including volunteers in Permolat, who now do all the track maintenance in the valley above Kiwi Flat Hut.

I could also find no comment from the department around the 4 year building phase requiring guaranteed access for those on foot entering the valley during this disruptive time. Therefore,

2. I seek that one of the conditions of any consent should be that during the building phase public access to the valley remains guaranteed at all times.

One further thing. There is no provision made that I could find for a public bridge across the outlet flow below the power house. There needs to be the ability to continue along the riverbank for fishers, hunters, trampers, etc. No doubt there will be one there, it just needs to be publicly useable.

And a final comment. As I indicated near the start, the Concession Officers Report is pretty comprehensive, but it's perspective with regard to significant effects on current users is quite out of sync with those most affected. In practical terms how the Power House buildings look visually is not greatly relevant to users of this valley but decent public access to Conservation land absolutely is. That should have been a significant focus of the possible recreational benefits right from the beginning. Four or 6km of roadwalking with a pack along a gravel road surrounded by cows and cow poo before reaching conservation land is not a solution.

Thankyou.

Lucy Croft

From: [redacted]
Sent: Wednesday, 26 October 2016 3:55 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Subject: Attention: Pauline Adams

My name is [redacted] lived in the Waitaha valley for several years. This is one of New Zealand's Wild Places. It is remote, not many people live in the area. It is a long way from everywhere. The nearest groceries are in Hokitika, and this coast road can be unreliable for transportation several times a year. There is not the infrastructure or industry to support this endeavor. You may be thinking that you can build it and the local economy, but the reality is that doing this would just serve to further destroy the local environment.

There are tenements of ancient Maori in this river gorge, history that would most likely be destroyed if hydroelectric power generation was to occur in the Waitaha valley.

I am strongly 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 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,

4

Lucy Croft

From:
Sent: Wednesday, 26 October 2016 10:31 p.m.
To: Permissions Hokitika
Subject: Stop the waitaha hydro project

Dear Pauline Adams,

Please stop this project.

This valley and the Morgan Gorge is an important asset to New Zealand and should be preserved for future generations

The Waitaha Valley is classed as an outstanding natural landscape by DoC

The Morgan Gorge is classed as an outstanding natural feature by DoC

There are other viable (and even consented) options for hydro power generation locally-Stockton and Arnold B. These other options are on already heavily modified rivers and do not hold the importance of teh Wiataha

It has been proven that the demand for additional power does not exist locally.
The only motivation for Westpower to build this is for money, not for local resilience.

NZ's greatest asset is its natural beauty. Let's protect it for our future generations.

--

Lucy Croft

From: [redacted]
Sent: Wednesday, 26 October 2016 10:29 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Cc: niconservation+waitaha@rivers.org.nz
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.

Remote conservation land is important internationally and its untouched value will increase with age. Development of the river will permanently damage the remote value of the area for ALL future generations.

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 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.

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.

Regards,

1

"It is not the strongest of the species that survive nor the most intelligent, but the one most responsive to change."

-Charles Darwin

Lucy Croft

From:
Sent: Wednesday, 26 October 2016 9:10 p.m.
To: Permissions Hokitika
Subject: Objection to waitaha hydro scheme

To whom it may concern,
I wish to be heard in support of my submission.

I am against the proposal for creating a hydro scheme on the Waitaha river.

This proposal is unnecessary and destructive.

Electricity industry experts and MBIE say there is no need for this scheme –we simply don't

need any more power generation in New Zealand

Westpower believe the scheme will make them money, but only because the water and environmental destruction on public land comes more or less for free

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 (e.g., Arnold, Stockton).

These don't require sucking the water out of our wild rivers

This is crazy. If we don't need extra power generation, then why ruin this unique and beautiful wild river?

The Waitaha is one of approx 1% of the rivers IN THE WORLD that is not modified, so let's

look to the future and not make the mistakes that other countries have made.

We can avoid this needless destruction of the pristine wilderness that kiwis are so proud of, for us, our children and our children's children. If this goes ahead it cannot be undone.

Furthermore granting of the concession goes against the intent of the use of stewardship land which is '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...' The westpower scheme is both development and extractive use of stewardship land.

Yours sincerely

Sent from Mail for Windows 10

Lucy Croft

From:
Sent: Thursday, 27 October 2016 8:07 a.m.
To: Permissions Hokitika
Subject: Objection to Waitaha Hydro Proposal

FTAO Pauline Adams

I wish to register my objection to this scheme. I used to live, tramp and kayak in New Zealand and I believe the environmental and recreational impact of this scheme is unacceptable. There are other energy options on the table that are less damaging.

Regards

Lucy Croft

From:
Sent: Thursday, 27 October 2016 8:30 a.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Subject: Attention: Pauline Adams

No, not the Waitaha River. Please, let the madness stop. Let us hold on, nourish and cherish every remnant patch of unspoiled wilderness in this one precious world. We must find other means of 'powering' ourselves than despoiling the earth on which our lives depend.

I set my three novels, the Watermark trilogy at the mouth of the Waitaha River, aware each time I visited of the potency and importance of this river, this vein of life — doing what veins do — conveying the life-stuff of our planet from the mountains to the sea — from source to source and nourishing life as it went.

Please, no more clogging, cauterising, draining, leeching of our wild rivers — let us find other means to sustain our communities and cities. Human ingenuity is vaster than we've begun to allow.

Leave the Waitaha to its beautiful, natural and vital way.

Yours,

Lucy Croft

From: _____
Sent: Thursday, 27 October 2016 8:44 a.m.
To: [Permissions Hokitika](#)
Cc: _____
Subject: FW: Waitaha River Hydro proposal

Hi All,

Please treat as a submission.

Cheers,

From: _____
Sent: Wednesday, 26 October 2016 9:09 a.m.
To: Hon Maggie Barry <Maggie.Barry@parliament.govt.nz>
Subject: Waitaha River Hydro proposal

Dear Honourable Minister of Conservation,

I have been aware for some years that West Power were considering building a hydro power generation scheme on the Waitaha River in Westland. The recent "Listener" article confirmed this.

I am strongly opposed to this proposal. The destruction of any of our remaining wild rivers would be a shameful act. I am all for the use of renewable energy systems and am acutely aware of the looming crisis of climate change. However I feel we must look to other ways of generating electricity if in fact we need to. We should be looking for efficiencies in the use of electricity. There is nothing efficient in reticulating electricity long distances from the point of generation to the end user. This central generation system linked to a distribution network is an outdated model and while it works for our present hybrid generation system of wind and hydro and geothermal, any future generation demand should be met by community or household owned solar generation where the energy is generated at or near to the point of use.

The Waitaha Catchment and particularly the Morgan Gorge is a special place which projects wild beauty on a grand scale. Unlike energy, beauty is a difficult thing to put a monetary value on. I have tramped and hunted in the Waitaha as a young man. It is a challenging place to say the least. These young people who kayak the Morgan Gorge are the Sir Edmond Hillary's of our time. Almost all of our lowland rivers are degraded. Please leave the upland rivers, particularly the Waitaha River to roar and rumble through the gorges unimpeded so tall poppies of the future have a place to grow.

Regards,

Lucy Croft

From:
Sent: Thursday, 27 October 2016 9:08 a.m.
To: Permissions Hokitika
Subject: Attn Pauline Adams: Submission on the Waitaha Hydro Scheme

I wish to register my opposition to the proposed Waitaha Hydro Scheme.

Please add my name to the list of people who are horrified at the continual commercialisation of our finite natural resource for ill informed and short term commercial greed.

Please tell Minister Barry that I'm one of the people of New Zealand who do not support the ongoing degradation of our country, and that as our representative for conservation, I implore her to exercise her mandate to conserve, not destroy our public treasures.

Yours sincerely,

Lucy Croft

From:
Sent: Thursday, 27 October 2016 12:49 a.m.
To: Permissions Hokitika
Subject: Waitaha Valley

DoC - DON'T ALLOW THIS TO HAPPEN!"

SUMMARY

This valley and the Morgan Gorge is an important asset to New Zealand and should be preserved for future generations

The Waitaha Valley is classed as an outstanding natural landscape by DoC

The Morgan Gorge is classed as an outstanding natural feature by DoC

There are other viable (and even consented) options for hydro power generation locally-Stockton and Arnold B. These other options are on already heavily modified rivers and do not hold the importance of the Waitaha

It has been proven that the demand for additional power does not exist locally

The only motivation for Westpower to build this is for money, not for local resilience

DETAIL

The Morgan Gorge, a spectacular and dominating steep schist gorge separating the front country from the back country on the Waitaha River, is an outstanding natural feature (ONF) in an outstanding natural landscape (ONL) (including the Morgan Gorge to its headwaters), and therefore a very 'special' piece of Department of Conservation (DOC) stewardship land, worthy of preservation and protection in its own right for the benefit of all New Zealand. • The Morgan Gorge, and the Waitaha Gorge and Windhover Gorge in the Waitaha River above it, is essentially a pristine river environment with outstanding wilderness and scenic values and is an exceptional Wild and Scenic river. The Morgan Gorge and the upper Waitaha River contains some of the most challenging and technically difficult white water kayaking runs in New Zealand, in an outstanding wild and scenic river environment

Recreation / Kayaking values

The outstanding white water in the Morgan Gorge has only been run by a limited number of expert kayakers, such is its difficulty, meaning it is the 'Mount Cook or Mt Everest' of white water runs in New Zealand – it is actually more than a Mt Everest, very few have conquered it (about 12 people from around the world). The outstanding natural feature that is the Morgan Gorge, and the water that flows through it, is a powerful testament to the geologic and climatic forces that shape the West Coast of New Zealand. The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers, and therefore like their exemplars of other outstanding beginner, intermediate and advanced white water runs water throughout the country, some of which are protected by Water Conservation Orders, warrant the same statutory recognition and protection.

Hydro Proposal

Westpower propose abstracting water via 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. The structures 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.

1 Douglas A Rankin and Shane Orchard, Impacts of the proposed Waitaha River Westpower hydro scheme on white water and kayaking values. Report prepared for Whitewater NZ, January 2015 (see <http://www.doc.govt.nz/pagefiles/164710/waitaha-kayaking.pdf>)

Impacts

Once installed the scheme would mean that kayakers can no longer use the Morgan Gorge at all – residual flows needed to kayak the Morgan Gorge when Westpower were taking water would be too unstable (rising or falling too fast) and risky (Westpower are not confident in their ability to take constant flows and so flows could change while a descent was underway) to run the Morgan Gorge safely. The residual flow of 3.5 cumecs in the 1.5 km reach from the bottom of the Morgan Gorge to the powerhouse would mean that kayakers doing the Waitaha Gorge run above the Morgan Gorge, and who normally portage the Morgan Gorge, would also have to portage a further 1.5 km. The residual flow would be too small to run the Class IV-III-II white water in the reach which requires 10-50 cumecs and no mitigation is provided for this loss. Westpower is only suggesting mitigation of two 'no-take days' per year, from 7.00 am to 5.00 pm on a nominated day, which would allow natural flows to be requested down the Morgan Gorge for kayakers to run the Morgan Gorge. However, the proposed request system is tortuous, inflexible, untimely, time-limited and very poorly responsive, and in complete contrast with what we had suggested would be needed if such a proposal was ever to be considered. No mitigation offered for loss of 1.5 km river below the Morgan Gorge.

Ruin the pristine nature of this outstanding wilderness river by introducing industrial development into the environment **Ruin** the mauri, wilderness and natural character, and high energy thundering white water natural character of the Morgan Gorge with the normal flow of water down it no longer present.

DOC decision

The DoC & Ministry for Conservation decision is taking advantage of the lack of action by DoC to classify this land appropriately by leaving it as "Stewardship land". This deliberate ploy is cynical and only benefits business cases such as this at the expense of the protection the land should be enjoying. DoC is supposed to protect this land for the people of NZ not for the businesses of NZ to exploit.

I request a reversal of this decision

It's time to speak up for common sense. Even though we are swamped with power generation here in NZ, Maggie Barry, Minister for Conservation has still approved in principle a concession for a hydro scheme to be built in the conservation estate on the amazing wild Waitaha river deep in the rugged West Coast bush. Electricity industry experts and MBIE say there is no need for this scheme – we simply don't need any more power generation in New Zealand. Westpower believe the scheme will make them money, but only because the water and environmental destruction on public land comes more or less for free. 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 (e.g., Arnold, Stockton). These don't require sucking the water out of our wild rivers. •

This is crazy. If we don't need extra power generation, then why ruin this unique and beautiful wild river The Waitaha is one of approx 1% of the rivers IN THE WORLD that is not modified, so let's look to the future and not make the mistakes that other countries have made - after all this is a 49 year concession! •

More reasons to request reversal of decision

Granting of the concessions is contrary to the intent of the use of stewardship land which is '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 could be disposed of ...'.² The Westpower scheme is both development and extractive (industrial structures and taking and using water) use of/on the stewardship land • Granting of the concessions is contrary to Regional and District Plans and the DOC West Coast Conservation Management Strategy that require protection of ONL and ONF such as

Morgan Gorge and Upper Waitaha River • An independent electricity industry expert has determined that power from the proposal is not needed for many years³ • There is no significant demand for extra power on the West Coast, the National Grid has already recently been upgraded to meet any foreseeable power demand on the West Coast, and there are already consented and likely cheaper options for power provision on the West Coast • If more reliable power is needed for the West Coast it can easily be provided for by the National Grid • In the absence of a compelling case for the need for the development of the proposed hydro scheme ('let us build it because we can/want to' rather than 'it is absolutely imperative that we build this scheme because we are desperate for the power') the scheme should not be built on Conservation Estate, and especially not in a pristine ONF and ONL environments – we should preserve our future option values (keeping important areas intact in case they are needed in the future) • The proposed Westpower scheme is totally out of keeping with the ONF and ONL values that exist in the Morgan Gorge and Upper Waitaha River

2 Hon Philip Woolaston, Associate Minister of Conservation, Stewardship Land and DOC – the beginning, September 2012, p7. Available at www.pce.parliament.nz; also see Parliamentary Commissioner for the Environment, Investigating the future of conservation: the case of stewardship land, Wellington, August 2013, p 21.

3 T Baldwin, Proposed Waitaha Hydro Scheme: Assessment of Reasons, Financial Viability and Alternative Locations, Wellington, May 2015; see <http://www.doc.govt.nz/pagefiles/164710/waitaha-reasons-financial-viability-alternativelocations.pdf>

Such a scheme should only ever be built as a last resort on such valued DoC Estate, otherwise what is the point of having preservation and protection of highly valued DoC Estate? New Zealand has a number of 'magical' places that create a country with outstanding natural landforms and environments and beauty. The Morgan Gorge and the upper Waitaha River are one of those 'magical' places. It needs to be protected for posterity and for future generations to enjoy.

-
- The decision to grant the concessions in principle should be reversed for many reasons, including a number mentioned above, and the application for the concession declined.

-
- I do not wish to be heard in support of my submission

Lucy Croft

From:
Sent: Thursday, 27 October 2016 3:22 a.m.
To: Permissions Hokitika
Cc: Tony Ward-Holmes (Whitewater NZ)
Subject: Waitaha Hydro Scheme

Hon. Maggie Barry,

As an overseas visitor that has come to the South Island of New Zealand on four separate occasions, spending over 300 days and many thousands of dollars there, I am deeply troubled by this decision to potentially permit hydropower development on the Waitaha River. I am one of the few people to have walked up the Waitaha to its headwaters at Ivory Lake, and one of the fewer still to have done it twice. Why put myself through this grueling exercise more than once? (As you probably know, the landscape there is remarkably difficult to navigate.) I returned for a second time because this river valley is simply the most beautiful, challenging, and awe-inspiring place that I've ever visited. It is the finest example of why I, and many other people, visit New Zealand. I intend on returning again, bringing my own children to experience the Waitaha when they are old enough. It would be a shame to trek all the way up to Kiwi Flat, only to see this powerful river being mostly diverted, dewatering the Morgan Gorge, one of the most beautiful and rugged spots in your country.

As someone from North America, I have great personal experience with the overuse of dams and their lasting negative impacts. While we are starting to learn our lesson about frivolous dam creation, and even beginning the process of removing many of them, why would New Zealand, a country that thrives on pristine natural resources, be considering allowing a project with such obvious environmental impacts and no real need for it? I challenge you to spend a few days traveling up the Waitaha River on foot. I doubt that by the end of it, you would approve this consent request.

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:**

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.

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.

A personal note

Dear Pauline

Please go on a hiking trip along the Waitaha river (e.g. to Moonbeam Hut) to experience firsthand what's at stake here. There are other ways to create energy if needed, but there is no return after pristine environment has been compromised.

New Zealand is very lucky to have these natural assets, but Kiwis do tend to not fully realize their value in my view. I grew up in Europe, and I have been living in New Zealand for over a decade now. I have also been able to experience the magic of the upper and lower reaches of the Waitaha in my kayak.

The proposed hydro scheme is of very short sighted nature; penny-wise and pound foolish. New Zealand's natural wonders are an asset; one of the few things that sets this country apart from others. Let's be smart. Let's think long term. Think about what will create the most value for New Zealand in the future.

Thank you.

Date: ~~November 3, 2016~~

RECEIVED 27/10/16

Lucy Croft

From: lucy@westpower.co.nz
Sent: Thursday, 27 October 2016 10:00 a.m.
To: Permissions Hokitika
Cc: Tony Ward-Holmes (Whitewater NZ)
Subject: Waitaha River submission

To Hon. Maggie Barry

I strongly oppose the proposed hydroscheme on the Waitaha River.

We have enough power generation in NZ, with electricity industry experts and MBIE saying there is no need for this scheme. Westpower believe the scheme will make them money, but only because the water and environmental destruction on public land comes more or less for free. This is crazy. If we don't need extra power generation, then why ruin this unique and beautiful wild river.

New Zealanders want to protect what we have for future generations, and we acknowledge the intrinsic value of the unique natural environment that we are so lucky to live alongside. Nature is not here for us to exploit and use as we desire, we have a responsibility to protect it in any way that we can. This does not include an unnecessary, damaging hydroscheme in one of our wild and untouched rivers.

Please reconsider your view.

Regards,

Lucy Croft

From:]m>
Sent: Thursday, 27 October 2016 10:10 a.m.
To: Permissions Hokitika
Subject: My opposition to the planned Hydroelectric scheme on the Waitaha River

Morena Pauline Adams,

My name is Donald Matheson. I am emailing you today in regards to the planned hydroelectric scheme on the Waitaha River on the west coast of the south island.

I would like to voice my opposition to the planned scheme on these grounds:

- This river is incredible valuable to kayakers and other outdoor recreation groups of New Zealand and around the world. The planned development would have serious negative impact on the river and the outdoor user groups
- I cannot find any information on power shortages or projected power shortages on the west coast, therefore cannot find any need for this scheme.
- The Waitaha is one of the few rivers left in the world that has not been modified and we need to value that fact for future generations

I wish the decision to grant the concessions in principle should be reversed or many reasons, including a number mentioned above, and the application for the concession be declined

I do not wish to be contact regarding my submission.

Thank you for your time.

27/10/2016

IN THE MATTER OF:**The intention to grant a run of the river hydro scheme concession to Westpower Ltd on the Waitaha River****Name: :****Address:****Phone:****Email:**

To the Director-General, Lou Sanson,

I am writing to express my concern over the proposed run of the river hydro scheme on the Waitaha River on the South Islands West Coast. I disagree with this project for the following reasons;

-Electricity Industry experts and MBIE suggest that we simply do not need any more power generation in New Zealand. There is no significant demand for extra power on the West Coast, the National Grid has already recently been upgraded to meet any foreseeable power demand on the West Coast, and there are already consented and likely cheaper options for power provision on the West Coast. If more reliable power is needed for the West Coast it can easily be provided by the National Grid.

-The site suggested runs along the Alpine Fault and it is short sited to spend so much money building a hydro scheme that could be ruined by an earthquake any day.

-The Waitaha River and Morgans Gorge is a pristine natural wonder which should not be tampered with and ruined for everyone for all of time. The Waitaha River is one of approximately 1% of rivers in the world that is not modified.

-There are a number of other hydro schemes on the west coast that are already fully consented and waiting to be built which could provide local power to the West Coast; The Arnold and Stockton.

-As a white water kayaker myself I would hate to see one of the pinnacle whitewater runs on the West Coast be tampered with for all future generations.

-There is a great tramping track up the Waitaha River and it would be a huge shame to ruin the pristine nature of this wilderness area for future users.

-Granting this concession is contrary to the intent of the use of stewardship land which was 'to protect them from development or extractive use until their conservation value could be established'. (Hon. Phillip Woolaston, Associate Minister of Conservation, 2012)

-It appears that this scheme would be an interesting project for a group of engineers that are keen for a challenge, this is not a good reason to tamper with a natural resource without very good reason!

27/10/2016

The decision to grant the concession should be reversed for many reasons, including a number mentioned above, and the application for consent denied.

I wish to be heard in support of my submission.

Yours Sincerely,

450

26 OCT 2016
BY: *Auth*

The Minister of Conservation

Department of Conservation

Wellington

17 Octobe2016

WESTPOWER HYDRO ELECTRIC PROPSAL WAITAHA

I am a retired civil engineer. I spent some years in the Government Hydro Design Department and I have retained an interest in these developments. I write in support of the Westpower proposal at the Waitaha River.

I have made two visits to European mountains to examine tunnel boring machines for hydro and road construction. I was also a keen kayak operator in modest rivers, not as extreme as the Morgan Gorge.

On three occasions I was told of arrangements made with kayak clubs when parts of rivers were to be diverted to tunnels or to penstocks. Generally, in non winter months, electricity demand is not very high in weekends. Clubs make written applications to have water returned to its original course on certain weekend days. Frequently they can request a particular water flow rate. This arrangement generally operates satisfactorily. I suggest that such agreements could be made with New Zealand kayak operators.

I have read most of the documents on the web, concerning this scheme and I do support it.

RECEIVED

27 OCT 2016

Dept. of
Conservation

Lucy Croft

From:
Sent: Thursday, 27 October 2010 9:26 p.m.
To: Permissions Hokitika
Subject: Waitaha Submission

To whom may concern,

I am writing to express my alarm and concern over the plan by Westpower to build a dam and hydro scheme at Morgan's Gorge on the Waitaha river. I find it somewhat farcical that our minister of Conservation thinks that it is environmentally sound practice to partially de-water one of the most pristine and spectacular gorges in New Zealand.

I have been into Morgan's Gorge on a number of occasions and the combination of clear water, native bush, rock walls and native bush are truly magnificent. Unfortunately the 'natural capital' of this environment does not seem to be of concern to the minister. New Zealand is running out of rivers that are left in their natural state and although hydropower is renewable it is not sustainable.

It would be a travesty if this project was allowed to proceed especially given that DOC, according to its own website; "Is the government agency charged with conserving New Zealand's natural and historic heritage". I would like to reiterate my strong opposition to what I consider to be a short sighted and environmentally damaging proposal.

Your's 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:**

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.

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!

in 1999. I planned the trip from around 1996, and a team of female kayakers with a desire to film a kayak documentary provided the budget, and opportunity to descend and document the river. The trip was a revelation. Incredible quality whitewater, in an environment with unsurpassed beauty, and challenges that represent the outer limits of possibility in the sport. In 1999 we decided that paddling Morgan gorge was a challenge to great for us, but it has become a regular challenge for those at the top of their game, and I was lucky come back 15 years later and complete a descent of this remarkable, raw, and powerful gorge.

My travels as a kayaker spanned 20 years, paddling around the world, with many wild descents in remote places earning me recognition in the international whitewater hall of fame in the explorer category.

The Waitaha experience is still at the top of my list of rivers to experience for those who want to experience adventure, pristine nature, and personal challenge. Not only in New Zealand, but also throughout the world.

Asking for a river to be saved purely because kayakers value the experience of paddling the river may be regarded as egoistic, but I think that at this stage we are some of the lucky few who have the skills, and motivation to visit such wild and untouched places as the morgan gorge. These places are disappearing fast, and I am afraid others may never get the chance to see and experience nature in its purest form.

I have lost count of the number of wild river canyons I have travelled through and around, but I know there are few in this world that compare to New Zealands own Morgan gorge.

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: November 9, 2016

Lucy Croft

From:
Sent: Friday, 28 October 2016 8:00 a.m.
To: Permissions Hokitika
Cc: Tony Ward-Holmes (Whitewater NZ)
Subject: Submission in opposition to the proposed power scheme for the Waitaha River

I am **very strongly opposed** to the hydro-electric power scheme proposed for the Morgan Gorge section of the Waitaha River, Westland.

The Morgan Gorge (and the Waitaha River generally) is truly one of New Zealand's natural treasures - a place of great beauty and awesome natural power. Unfortunately, relatively few of these truly wonderful places remain. Those that do must be protected at all cost to prevent the insidious creep of development that has irreversibly degraded our natural environment. Altering the river flow regime through the gorge will greatly degrade its natural aura and also greatly reduce its suitability for recreation (in particular whitewater kayaking, for which the gorge is internationally renowned).

More electricity generation is not required in NZ. We already have enough generation capacity and future changes both in demand (e.g. likely very large decrease from Tiwai Point smelter and other heavy manufacture in NZ, improving efficiency of use through emerging technologies) and supply (new technologies such as solar and wind generation) mean it is unlikely that new hydro-electric power generation will be required. There are much better ways of providing our future electricity needs than building new hydro schemes.

If the concession were to be granted, we would lose one of our most precious natural treasures for, essentially, nothing. This makes absolutely no sense. It therefore must not proceed.

I believe that one of DoC's key responsibilities is to protect our special wild places both for future generations and also for their intrinsic natural values. If the concession were to be granted, DoC and the Minister would be failing to live up to this responsibility.

Please do not grant this concession.

I do not wish to be heard.

Regards

Lucy Croft

From:
Sent: Friday, 28 October 2016 11:34 a.m.
To: Permissions Hokitika
Cc: Tony Ward-Holmes (Whitewater NZ)
Subject: Waitaha submission

Dear Minister,

I am a kayaker living in Wellington, but I regularly visit the south island and west coast for "adventure kayaking".

I object strongly to westpowers application to create a run of the river scheme on the Waitaha river.

I'm training up to go and run the Morgan gorge.

The proposal for 2 "no take" days for recreational access, consists of a difficult request system entirely different to the needs of a kayaking community for a remote river with variable rain patterns.

The west coast should not trade its sublime wild and scenic attractions for the Waikato's gross need to do carbon neutral farming, especially in a climate of adequate electricity generation and increasing environmental appreciation.

The spectacular schist canyon with it's thundering white water, is a polished example of west coast geology and the forces shaping it, and should be, like other singular examples of natural character, be protected by a Water Conservation Order.

Yours sincerely

Lucy Croft

From:
Sent: Friday, 28 October 2016 4:01 p.m.
To: Permissions Hokitika
Cc: Mick Hopkinson; John Verdon; Aaron Pruzan; Jon Hindman; Kim Hindman; Kevin Patno; Andrea Paul
Subject: Save the Waitaha

To Whom it May Concern:

I am a visitor from the USA, currently staying on the South Island, and am appalled at the idea of a new dam for the purpose of hydroelectric power. Not only is this an antiquated concept for energy production, but only benefits the developer. In contrast the devastation to the environment will endure for millennia.

One of the greatest resources available to fuel your economy is tourism, and if you fail to protect your natural resources then visitors like myself will no longer travel here. Do not make the same mistake as other countries, including my own. The damming of rivers was once thought to be a great public works success, but time has demonstrated the opposite to be true. In fact, the worldwide trend is to dismantle dams, not to construct new schemes.

I consider this proposal to be foolish at best. Please take a deep breath, exhale and then make the obvious correct decision by denying this request. The future of New Zealand depends upon your foresight in this matter.

Thank you for this consideration.

Sincerely:

Lucy Croft

From: om
Sent: Saturday, 29 October 2016 2:07 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Subject: Attention: Pauline Adams

I have never been to the Morgan Gorge in the Waitaha River (although I fully intend to) but I am richer for it's presence. Wild, untamed places such as this are truly precious and have an intrinsic value that benefits our society in ways that we cannot measure. If the proposed hydro scheme is to proceed it will be a desecration of a national treasure that can never be reversed. I urge you to look beyond dubious short term benefits and make a decision that is in the best interests for all.

Thank you for your attention

Lucy Croft

From:
Sent: Sunday, 30 October 2016 8:12 a.m.
To: Permissions Hokitika
Subject: Waitaha River - opposed

I'm writing to oppose the application by Westpower Limited for a Lease, Easement and License for a hydro scheme in the Waitaha River. The wild and remote nature of the Morgan Gorge should be maintained, particularly given that there are other options locally on other, already modified rivers.

Kind regards,

642

Lucy Croft

From:
Sent: Sunday, 30 October 2016 9:35 p.m. >
To: Permissions Hokitika
Subject: Attain: Pauline Adams
Attachments: IMG_7097.jpg; IMG_7099.jpg; IMG_7101.jpg; IMG_7103.jpg; IMG_7110.jpg; IMG_7111.jpg; IMG_7115.jpg; P1040888.jpg; P1040890.jpg; P1040892.jpg; P1040896.jpg; P1040902.jpg; P1040910.jpg; P1040916.jpg; P1040919.jpg; P1040926.jpg; P1040929.jpg

Director-General
Department of Conservation
Private Bag 701
Hokitika 7842

Dear Pauline

re: The Proposed Waitaha Hydro Scheme

I wish to make a submission in writing against this proposed development. Last January I travelled down the Waitaha, after crossing Seddon Col from the Bracken Snowfields, with my friends, so I am familiar with the Waitaha Valley. In my view this valley is of outstanding Conservation and Recreational value. I enclose some photos to go with this submission taken on my trip down the valley. I will not go into any technical details about the scheme but rather I want to highlight the intrinsic qualities and integrity of a relatively undisturbed landscape of inestimable value. Although this river/run scheme may not seem to have a major impact to the casual observer, it in fact will disrupt the integrity of the whole wilderness here. Wilderness and wild rivers are a scarce resource in today's world and we have a duty to preserve them from unbridled development. It does not matter that you or I may never travel down the Morgan Gorge, but we have a duty to preserve it for its own sake and the sake of future generations.

I am unhappy that there are so many west coast rivers in the 'stewardship' of DOC and without adequate legal safeguards. Can I propose that a new national park be created to the north of Westland NP to include the Whataroa, Wanganui, Waitaha, Mikonui, Hokitika and Whitcombe valleys. I know most of these valleys from my tramps and climbs and all are areas of high conservation value and a refuge of endangered species.

Yours sincerely

Lucy Croft

From: Sunday, 30 October 2016 11:53 p.m.
Sent: Permissions Hokitika
To: Attention: Pauline Adams: Submission On Westpower Concession For Waitaha River
Subject: Hydro Scheme

Sunday 30th October 2016

Attention: Pauline Adams
 The Director-General
 Department of Conservation
 Private Bag 701
 Hokitika 7842

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 understand 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 wild river and its intrinsic character at the Morgan Gorge would be degraded for the duration of the operation of the hydro scheme. This duration could be considered an indefinite period rather than the 49 year concession to be granted. Once this infrastructure is in place it is unlikely to be removed.

The impacts on the natural values of the area include:

- The intrinsic nature of this undisturbed river in South Westland.
- 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 where the Waitaha enters the gorge will impact the naturalness of this special place.
- The upper catchment of the Waitaha is highly valued for its sense of remoteness by trampers and hunters alike and is considered to be of international significance for kayakers.
- There are no mitigation measures that can compensate for the change from an outstanding wild and remote experience in the upper Waitaha to what will become a modified, 'industrialised' environment as a result of the reduced river flow, weir and associated infrastructure.
- 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 loss of habitat for lizard species at risk of extinction, including the green and forest geckos.

Any loss of threatened, nationally important species, is significant. Westpower has identified 27 native bird species within the hydro footprint, including a number of threatened native bird species. These include kaka, falcon and whio. The long tailed bat is present within the footprint. The clearance of habitat and tree felling will result in loss of their breeding and feeding habitat and has the potential to cause the death of bats. This is an inappropriate risk given the purpose of conservation estate and one that cannot be adequately mitigated.

In regard to the need for West Coast electricity generation:

- It has been agreed demand for electricity is flat at this time, though demand may grow in the future. The Waitaha scheme will be providing a resource for which there is at this time no shortage.
- Rio Tinto could decide to terminate the New Zealand Aluminium Smelter at Tiwai Point. If that happens during the four year build of the Waitaha River scheme, a flood of electricity will enter the market. That could upset the economics of the Waitaha River scheme.
- Could we not be smarter with how we generate electricity today? It's 2016, not 1968. While the hydro schemes of last century are marvels of engineering, could we not implement wind, solar and battery technologies to provide electricity while retaining these marvellous, wild, natural areas for prosperity?
I think distributed generation does contribute to security of supply, but with today's maturing wind, solar and battery technologies surely these could be a better option for providing electricity and retaining undisturbed wild areas of high intrinsic value?
- I do not consider that reducing transmission loss is a justification for the Waitaha scheme. Regardless of the outcome of the proposed Transmission Pricing Methodology, which may not be politically achievable, the established population centres will remain. Electricity will continue to be generated by the major schemes of last century and transmitted to areas of demand as required. I do not think the Morgan Gorge should be sacrificed to make electricity slightly less expensive for some consumers.
- A national grid will continue to be required for security of supply country-wide. I suspect it will be paid for by consumers connected to it whether or not they generate their own electricity, or are supplied by schemes close to their homes.
- How much 'development creep' is to be tolerated? If the Waitaha River scheme is consented, and over time demand grows on the West Coast, at the point local generation falls below a determined level again, will the exploitation of further rivers on Conservation land then be sought? There are consented schemes on the Arnold River and at Stockton. Now the Waitaha River is sought after. When does this stop? And if it will stop, why not now?
- Existing electricity sources for the West Coast are arguably sufficient for the medium term. Conservation land – the public commons - and particularly land of such high intrinsic value, should not be sacrificed for the benefit of shareholders in a private company, nor a few dollars less in electricity charges per annum for consumers.
- The security of supply offered by this scheme:
 - Could be achieved by a mix of other electricity generation methods, in terms of local supply stability.
 - Is dubious, given an event significant enough to take out the national grid supplying electricity to the West Coast would likely also affect the Waitaha River scheme and others. The Geotech Geological Feasibility Report advises of earthquake risks to the Waitaha River scheme.

With conservation land of such high intrinsic value at stake, and no shortage of, or pressing need for, electricity from this source, I consider it justified that the Application be declined.

I do not wish to be heard in support of my submission.
Thank you for your consideration of it.

Yours faithfully

Submission on the Proposed Waitaha Hydro-electric Scheme

To Department of Conservation

From

31 Oct 2016

I am opposed to any modification and reduction in opportunity of any this wild area in our conservancy.

The Waitaha's Morgan Gorge is a unique and absolutely unspoiled area. Nationally we need increasing opportunities for recreationalists from here and overseas. Our key and iconic wild places for tourism are being over-visited. Pressure last summer for example was extreme in many places. New places for tourists to visit and enjoy are an important planning challenge for the future for DOC. Tourists who wish to visit wild and natural places are looking for such experiences the world over. Morgan Gorge presents a place where this could be developed. It is already world renowned for kayaking and needs be preserved as a special and internationally recognised, absolutely unmodified experience.

The Conservation Act is how DOC's operations should proceed, and that is conservation first and foremost, fostering recreation second, and allowing tourism third. DOC's intention to grant this ability to make private profit from a public good, is against the Conservation Act.

The Conservation Management Strategy is currently so large, cumbersome, wordy, all-encompassing and yet also contradictory, that almost any interpretation can be made by planners for this conservancy by referring to an appropriate part of the CMS when concessions, easements, land swaps etc are applied for. The most important reference must be to the Conservation Act which charges DOC with a very particular task. Not included in that task is ruining one of the most stunning, special, unmodified, natural gorges in the world.

I would urge DOC to step back and look at the bigger picture. This proposed scheme will de-water the Morgan Gorge and it is far more valuable to New Zealand, economically in the future, as a potential place for satisfying the huge international demand by tourists for natural places to visit, than it might be as a place for a few investors to make a private profit in the short term.

Lucy Croft

From: [redacted]
Sent: Monday, 31 October 2016 1:45 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
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 for two reasons:

1: 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 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 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.

2: 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 consenting further hydro generation that justifies the destruction of such a wild and special place. Also as per the Baldwin report, the power itself is not required other than for an ill-founded goal of the coast being self reliant for power. A national approach of regional self reliance for power generation is inefficient in the extremes.

Yours,



A

Lucy Croft

From:
Sent: Monday, 31 October 2016 3:24 p.m.
To: Permissions Hokitika
Subject: Submission on proposed Waitaha Hydro scheme.

Submission to the Department of Conservation (DOC) regarding the intent to grant a concession for a hydro-electric generating scheme on the Waitaha river in South Westland.

Name of submitter:

Residential Address:

Postal Address: |

Phone/mobile: No phones

Email:

Statement:

- 1.) I make this submission on my own behalf, and do not represent any group, organisation, party or institution.
- 2.) I do not stand to gain any pecuniary or trade advantage from any outcome of the proposal.
- 3.) I do wish to be heard and would be willing to be heard with others making similar submissions to mine.

Submission:

I **oppose** granting a concession for this proposal to proceed.

Reasons:

There can be little doubt that Morgan gorge, which is the site of the proposed river run hydro scheme, is an outstanding natural feature of national and international significance located in a wild and unmodified landscape, much valued by those who visit it.

Therefore:

1.) The proposal is contrary to the definition of "conservation" as it appears in the Conservation Act 1987, under which the Department of Conservation (DOC) was established, which defines "conservation" as "the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations" because:

The proposal will compromise the intrinsic value of the gorge by permanently altering a key feature, namely the river flow, through it.

2.) The proposal is contrary to the mission statement of DOC, which is "To conserve New Zealand's natural and historic heritage for all to enjoy now and in the future" because:

Morgan Gorge is widely regarded as an outstanding feature of New Zealand's natural heritage. Since the proposal would require a permanent reduction in one of its key features, namely the river flow, granting a concession to the application would fail "to conserve" that heritage.

3.) Section 17U(4)(a) of the Conservation Act 1987 states that:

"The Minister shall not grant any application for a concession to build a structure of facility, or to extend or add to an existing 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; or

(ii) 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; or

(b) could reasonably use an existing structure or facility or the existing structure or facility without the addition.

Currently, on the West Coast, there are 2 projected and consented hydro-electric schemes, namely on the Arnold river and on the Stockton plateau, the latter being actively progressed.

Both schemes are in modified landscapes and are reasonable alternatives to the proposed Waitaha development.

4.) None of the supplied impact reports acknowledge or consider the potential effects of the adjacent tunnelling operation on the stability of the rock formations in Morgan Gorge. It is surely pertinent to question whether blasting and drilling could destabilise, destroy or otherwise affect those formations.

5.) Granting of the application would create a precedent on the West Coast for opening high value Public Conservation Land (PCL) on the Coast to other industrial-scale developments such as roads and mining, with the consequent cumulative and overall degradation and loss of those values.

End of submission.

31/10/2016

Lucy Croft

From: [REDACTED]
Sent: Monday, 31 October 2016 9:31 p.m.
To: Permissions Hokitika
Subject: Submission on the proposed Waitaha Hydro Scheme by Westpower

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

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

SUBMITTER:
 Your name:
 Address:
 Email:

Introduction

I am a person who enjoys the outdoors.

Submission

Westpower is seeking concessions in the form of leases, licenses and easements, and therefore under Part 3B of the Act the Minister must be satisfied the proposed activities are both appropriate and lawful.

Under Section 17 S (2) of the Conservation Act the minister is required to consider the financial viability of the proposal. Reservations about financial viability were one of five reasons given by the Minister for declining the Fiordland Monorail application in 2014.

The financial underpinning of the Westpower Waitaha Hydro Project appears to be based on predictions of power demand that are at odds with other forecasts (See Baldwin Report DOCCM 234-5375, p 22, DOC Concession Officers Report, Section 2.14), therefore casting what can only be considered significant doubt upon the financial model used by Westpower.

Given this significant doubt, it would be inappropriate in terms of 17S (2) of the Act to impose adverse effects on conservation values* in authorising such a project. To authorise a non-viable business with such effects would be inconsistent with the Act's purpose.

Under Section 17 U (4) (a) of the Conservation Act, the Minister is not able to grant a concession when they are satisfied the activity could reasonably be undertaken in another location that is outside the conservation area in question, or where the potential adverse effects would be significantly less.

Westpower's Waitaha application fails to address alternatives to the Waitaha Scheme which include;

Arnold River hydro scheme
 Stockton mine and Stockton plateau hydro schemes

The suitability of these schemes as alternatives is discussed at length in Tony Baldwin's Report (DOCCM 234-5375, Section 13, DOC Concession Officers Report, Section 2.14). Each of these schemes is already fully consented and under section 17 U (4) (a) of the Act, how then can the Minister grant concessions for the activity proposed by Westpower in relation to the Waitaha scheme.

SUBMISSION:

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 request that the intention to grant be reversed and that the concession not be granted on the basis of the discussion above.

I wish to be heard in support of this submission.

Name

Date 31/10/16

Links

Department of Conservation Concession Officers Report Tony Baldwin Report Conservation Act 1987 (Refer Part 3B, Section 17 S-U)

* "promote the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations."

Section 17S(2)

Where an applicant applies for—

- (a) a lease; or
- (b) a profit à prendre or a licence granting an interest in land; or
- (c) an easement;—

the applicant, in addition to supplying the information required by subsection (1), shall supply reasons for the request and sufficient information to satisfy the Minister, in terms of section 17U, that it is both appropriate to grant the lease, profit à prendre, licence, or easement and lawful to grant it.

Section 17U(4)(a)

The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing 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; or
 - (ii) 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.

Lucy Croft

From:
Sent: Tuesday, 1 November 2016 7:33 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Subject: Attention: Pauline Adams

Hi Pauline..

How are you? well I hope you are OK... you may be getting a few of these letters in response to your recent announcement of damning the Waituna River..

PLEASE hear the cry of the people.. ONCE these wild rivers are Damed... that is it!!!! I know you want to look like you are doing something for humanity and in the name of progress... BUT surely.... you can see that the actions of past environmental protection actions have benefited everyone and the health of NZ....

We live in this age of conservation and environmental awareness... I recently spoke with a farmer of old (he is now 67 yrs old) who remembers those manky tree hugging hippies and thought what they were doing was silly and irresponsible... BUT NOW - he is eternally grateful that we have not lost some of our wild old growth forests and understands the significance to our physical and mental health..

He now protects these places though his local council ensuring that farmers are abiding by environmental policies...

I URGE you to visit these wild places... that are a thing of great significance to LIFE... not just look beautiful!!!

We as humans need to change our lifestyles and choices and embrace better technology that doesn't require damning!!

Thanks for reading and I BEG that if you were to NOT damn that you would be more popular... please revisit your values... thanks

the rest... you can read... but I think you may have already seen a fair bit... just the formal stuff backing up my (and for me about 100 others who won't get around to writing this letter because they already feel defeated) sentiment! ...

All the best

And now for the well thought out letter.....

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,
nicola woolford
397 Anakiwa rd Ankiwa RD1 Picton

Lucy Croft

From: [Redacted]
Sent: Tuesday, 1 November 2016 9:31 p.m.
To: Permissions Hokitika
Cc: Tony Ward-Holmes (Whitewater NZ)
Subject: Proposed Waitaha Hydro Scheme:

Dear DOC

the proposal by Westpower to construct a hydro power scheme on the Waitaha River lacks a credible case and should not proceed. The proposed hydro power scheme would not deliver low cost electricity, would not avert a claimed lack of electricity on the West Coast, but would cause significant damage to a remarkable piece of the New Zealand environment by robbing much of the river of its wild flow. Close study of the extensive report on the proposal by Tony Baldwin makes it very clear this is an ill-conceived project that will deliver little genuine benefit to the West Coast or to New Zealand, but will cause major loss. The proposed project can not proceed when it is so lacking in merit.

Sincerely

!

P Please consider the environment before you print this email.
"The contents of this e-mail (including any attachments) may be confidential and/or subject to copyright. Any unauthorised use, distribution, or copying of the contents is expressly prohibited. If you have received this e-mail in error, please advise the sender by return e-mail or telephone and then delete this e-mail together with all attachments from your system."

Lucy Croft

From: ()
Sent: Tuesday, 1 November 2016 11:13 p.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:

I am a student at Victoria University, majoring in Classics, Geology, and (most relevantly) Environmental Science under a BSc. Whatever happened to preserving our beautiful rivers and waterbodies? We have so much to protect, and so much to lose if we do not act upon that. Further, we should be trying to incorporate the Maori culture, the river has a mauri (life force), and we should be aiming for kaitiakitanga (guardianship) - not mindless destruction. It's time New Zealanders showed some respect, and led the world in that same idea.

Westpower is seeking concessions in the form of leases, licenses and easements, and therefore under Part 3B of the Act the Minister must be satisfied the proposed activities are both appropriate and lawful.

Under Section 17 S (2) of the Conservation Act the minister is required to consider the financial viability of the proposal. Reservations about financial viability were one of five reasons given by the Minister for declining the Fiordland Monorail application in 2014.

The financial underpinning of the Westpower Waitaha Hydro Project appears to be based on predictions of power demand that are wildly at odds with many other forecasts (See Baldwin Report DOCCM 234-5375, p 22, DOC Concession Officers Report, Section 2.14), therefore casting what can only be considered significant doubt upon the financial model used by Westpower.

Given this significant doubt, it would be inappropriate in terms of 17S (2) of the Act to impose adverse effects on conservation values* in authorising such a project. To authorise a non-viable business with such effects would be inconsistent with the Act's purpose and the Minister would therefore be at error.

Under Section 17 U (4) (a) of the Conservation Act, the Minister is not able to grant a concession when they are satisfied the activity could reasonably be undertaken in another location that is outside the conservation area in question, or where the potential adverse effects would be significantly less.

Westpower's Waitaha application fails to address alternatives to the Waitaha Scheme which include;

Arnold River hydro scheme
 Stockton mine and Stockton plateau hydro schemes

The suitability of these schemes as alternatives is discussed at length in Tony Baldwin's Report (DOCCM 234-5375, Section 13, DOC Concession Officers Report, Section 2.14). Each of these schemes is already fully consented and under section 17 U (4) (a) of the Act, the Minister is therefore not allowed to grant concessions for the activity proposed by Westpower in relation to the Waitaha scheme.

SUBMISSION:

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 request that the intention to grant be reversed and that the concession not be granted on the basis of the discussion above.

I wish to be heard in support of this submission.

1/11/2016

Links

Department of Conservation Concession Officers Report

Tony Baldwin Report

Conservation Act 1987 (Refer Part 3B, Section 17 S-U)

* "promote the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations."

Section 17S(2)

Where an applicant applies for—

(a) a lease; or

(b) a profit à prendre or a licence granting an interest in land; or

(c) an easement;—

the applicant, in addition to supplying the information required by subsection (1), shall supply reasons for the request and sufficient information to satisfy the Minister, in terms of section 17U, that it is both appropriate to grant the lease, profit à prendre, licence, or easement and lawful to grant it.

Section 17U(4)(a)

The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing 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; or

(ii) 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

Lucy Croft

From: [Redacted]
Sent: Wednesday, 2 November 2010 9:22 a.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
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.

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.

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 become a significantly modified and 'industrialised' environment as a result of the reduced river flow, weir and associated infrastructure.

Effects on significant flora and fauna habitat:

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.

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,

**Intention to grant a run of the river hydro scheme concession to
Westpower Limited**

Submitter:

Address:

Email:

Date:

Hearing: I do not wish to be heard on my submission.

I **oppose** the granting of a concession to Westpower for a run-of-river hydro on the Waitaha River.

Submission on 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.

I fully support the submissions in opposition to granting a licence, lease and easement on the Waitaha River.

In particular I support the submissions of:

- Whitewater NZ,
- Federated Mountain Clubs of New Zealand,
- Royal Forest and Bird Society,
- West Coast Greens of Green Party of Aotearoa NZ.

Any granting of such concession would enable the construction and operation of a run-of-river hydro on that internationally spectacular river.

I believe that in a hedonistic rush to progress and upgrade New Zealand's economic status the intrinsic values of our fabulously rich sub-tropical rainforest Gondwana heritage are being either forgotten, misunderstood, not even understood, discarded, or sidelined. This is an appalling attitude by those in a position to know better.

In recent times Department of Conservation has frequently extremely disappointed those people who care about the quality of our environment by favouring economic progress over the intrinsic values of the lands DOC holds for that very purpose - to maintain in perpetuity the natural evolution of our ancient ecosystems, ecosystems without which the human species is doomed, both morally and physically. Death by a thousand cuts is happening right now with our conservation estate, where bits and pieces are being transferred to industry. With such inroads the integrity of the whole is being undermined. We do not have enough information to determine at what point the whole of the ecosystem collapses, and it appears that DOC is not adhering to the precautionary principle but is rather having a fire sale on our rich treasure chest of Gondwana heritage. It is time to stop this madness and regain earlier principles of protecting those treasured areas.

My birthplace is the west coast of Scotland. My father worked on the Loch Marie hydro project. I visited in my early twenties and was dismayed to see the loch a big lake, with the dead beech forest still standing. My heart bled for the loss of intrinsic values in that area. Google Earth shows that just about every loch on the west coast of Scotland is now dammed. Why? To support economic progress and our species' insatiable lust for material possessions. If the damming of those lochs had been even slightly restrained, perhaps there would not have been overt gain in materialism, and the United Kingdom as a whole would have learned to live on a little less but would still have that wild west coast country a little more intact. This would have been so much better for both freshwater and terrestrial ecology/ ecosystems and for the spiritual well-being of humans, this last an all but forgotten basic need of the human species.

Waitaha is not needed for electricity generation. The Amethyst is a great boon for South Westland, but more indigenous power is needed in the north of the west coast. The postponed hydro proposal for Stockton is now being progressed and it will not be long before work starts on the project. This is a very good project as it is in highly modified land and will help alleviate problems associated with the coal-mine in the area by dealing with

the acid-mine drainage as well as providing a secure and bountiful supply of electricity, using a very clever provision - that of the incredible drop plummeting from the Stockton Plateau to the shoreline below.

I believe the only decision the Department of Conservation can make is that of declining the request for a concession for the spectacular Morgan's Gorge of the Waitaha River. It is better that the proposal is declined in its early stages rather than in the Environment Court. We cannot afford to lose any more of our fantastic wild rivers to industry. Please do what is right for that intact environment and refuse Westpower industrial access to Morgan Gorge.

Lucy Croft

From:
Sent: Wednesday, 2 November 2016 12:07 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Subject: Attention: Pauline Adams

We live in the beginning of a new millennium and owe it to our children/grandchildren/future generations to make wise decisions now for the future. New scientific research findings and new technology is pointing us to better ways of producing power for our needs. They are giving us new leads regarding our continued footprint on our wonderful planet.

Hydro-electric production of power is a way of the past and is proven to be detrimental to the land, environment and species living around such projects.

We need to further our thinking and embrace more advanced ways of looking toward our future and saving our landscape/natural habitats and the living creatures living and nourished there.

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 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 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.

704

Lucy Croft

From:
Sent: Wednesday, 2 November 2016 3:26 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
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.

This river is one of only a few unmodified river systems left in New Zealand. DOC is supposed to be protecting this area, and, as far as I am aware, has a statutory obligation to do so. Westpower's own reports do not define any guaranteed benefits to the West Coast, and in fact this scheme may actually increase power costs to consumers by way of increased lines charges.

If there were a power shortage on the coast then surely Trustpower would have proceeded with the Arnold river scheme. A better solution would be for Westpower to take over the Consent for the Arnold River Scheme if they feel that more electricity generation is needed. Should Westland Dairy Co. ever replace their coal consumption with electricity then I could understand the need for additional generation, but to date I have not heard of such a proposal, and until I do I will be both angry and disappointed if DOC allows this scheme to proceed on the Waitaha River. Thank you for reading this submission

Yours,

709

Lucy Croft

From:
Sent: Wednesday, 2 November 2016 7:40 p.m.
To: Permissions Hokitika
Subject: Waitaha Hydro Scheme

Dear Lou Sanson,

I strongly oppose the proposed Waitaha Hydro Scheme.

Me and a group of active trampers have enjoyed many a trip up the Waitaha gorge and we believe that a dam would change the character of the valley substantially.

The upper Waitaha contains as you know a great infrastructure of huts and tracks including the mythical Ivory Lake Hut. For many trampers reaching Ivory Lake Hut is the highlight of many people's tramping ambitions. With the recent work of and it is often reached on foot passing Morgan Gorge.

A Hydro Scheme would detract greatly from the recreation values of the valley by loosing the spectacular Morgan Gorge one passes at the start of the trip. It would also potentially restrict access up the tracks through the gorge.

An alternative track through the bush is not a satisfactory alternative given the unique spectacular nature of Morgan Gorge, which can be admired from the current track and swing bridge.

Those who do not venture into the upper part of the Waitaha Valley can experience this great geographical feature on an easy daytrip or overnight trip to Kiwi Flat Hut. Kiwi Flat Hut is often used by hunters, whose experience will undoubtedly suffer as a result of the hydroscheme if not become impossible.

Finally, I believe that the gorge and the valley has intrinsic value and should be protected even if recreational interests weren't at stake. Our nationally endangered species love the wild turbulent west coast valleys. Why upset their population further by diverting their Waitha liveline through a tunnel?

Thank you for considering my submission.

Regards,

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P

I

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: r

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) administered stewardship land. Westpower Ltd 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 Ltd 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 do not 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 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, surrounding forest, 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 like trampers and hunters.

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 1987, and especially with respect to the purpose of DOC administered 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. Transpower have upgraded the national grid feeding the West Coast and this generation is not required to meet demand or security of

supply

- is contrary to various Objectives and Policies in Regional and District Plans. It is contrary to the West Coast Conservation Management Strategy that has been developed over many years with much public consultation and input. Granting the concession would prove yet again that DoC is happy to ignore well developed regional plans designed to promote the management of conservation lands
- will prevent current recreational users and particularly kayakers from accessing the Morgan Gorge and 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 as well as the creation of roading and other structures that will transform the site and its surrounds with man-made structures. Such issues are not properly addressed in the application and cannot be readily be mitigated.
- the mitigation offered if the scheme goes ahead is insufficient and in no way remedies or minimises the impacts of this proposal on the inherent values of the site and the intrusion on the wilderness values. 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 a number of other less damaging and already consented power schemes on the West Coast that can be developed to supply power. The Ministry for Business Innovation & Employment has stated there is no lack of capacity in New Zealand. It would appear there is no wider economic justification for the scheme contrary to what Westpower Ltd portray in their application
- The scheme would appear to be purely for the commercial benefit of Westpower Ltd and in no way provides wider economic or social benefits.
- I have spent the past 25 years exploring the wild places of New Zealand. Almost without exception the damage created by hydro power schemes such as lost native habitat, intrusion on wilderness and modification of outstanding natural landscapes cannot be mitigated or remedied. The effects are permanent. The beneficiaries are business using public land for private gain with a very short term view. Any scheme on this river will change it in ways that will outlast all of us and our children's children and is an example of very poor stewardship. Good stewardship is something the DoC is supposed to be promoting

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

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.

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 if hearings are conducted at suitable location and time.

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
- 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?
- The rapid development of solar and wind generation and increasing efficiencies in electricity use makes the further spoiling of wild rivers short sighted and unnecessary. These new technologies provide the perfect complement to our existing hydro network. Despite its high rain fall, the west coast receives quite high sunshine hours making the
- I am a kayaker and also cherish New Zealand's wildlands on foot. South Westland together with Fiordland comprise the county's largest wild and remote landscape. I have tramped in many of South Westland's wild valleys including the Whataroa, Perth, Copland, Karangarua, Paringa, Landsborough, Pyke, Olivine, Forgotten, Burke, Turnbull and the Arawhata. To have spent time in this country is what makes me feel so rich to be a New Zealander.
- Although I have not kayaked in South Westland I aspire to. Even if I never achieve this ambition I like to know that the rivers will continue to run free for those present and future generations who wish to take up the challenge.
- Although wild rivers and virgin bush may seem abundant on the West Coast, nationally (and particularly internationally) this is not the case. The Department has the privilege of managing these precious public lands on behalf of their owners – New Zealanders. The Conservation Act is quite clear that they be managed to protect their intrinsic values – not as an industrial landscape.
- The Department has become very adept at ignoring its own founding and guiding legislation. It is not the role of a government agency to make decisions beyond the law in an effort to double guess or please politicians. I plea with the Department to make a decision on the facts and to avoid sagas like the Glenorchy – Hollyford Tunnel, Air Access in Fiordland National Park and guided walking numbers on the Routeburn where the public are losing out to commercial interest with an alarming lack of transparency behind the decision making process. The Ombudsman was

extremely critical of the Routeburn Guided Walks decision making process and demanded that Department apologize to affected parties.

- Areas were set aside as public conservation land in a far sighted era when our wild and scenic lands were in little apparent risk of development (with the exception of our lowland forests). Now at the very time when their protection is starting to really mean something, the Department appears to crumple at the first challenge from commercial interests. I liken consenting to development on our conservation lands with the concept of eliminating minimum flows in rivers in drought years i.e. removing safeguards at the very time they are needed.

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: November 2, 2016

2nd November 2016

To whom it may concern:

I am writing this submission in absolute and complete favour of reversing the decision to grant the concessions (leases, licences and easements) awarded to Westpower for their hydro power generation venture on the Waitaha river.

It is abhorrent that such an ancient, pristine and magical piece of our estate be opened up for irreversible destruction without any foreseeable cause to do so. Considering there are already existing, consented hydro generation sites ready for development on the West Coast it seems nonsensical that a new site is even being considered, let alone conceded.

The only reasonable summation one can exact from this foolish and short sighted plan is that it stands to generate money for the stakeholder (Westpower). If we take into consideration that most of the developed world are already moving away from this style of electrical power generation and in fact, investing in deconstruction of such structures it begs the question as to why Westpower are pursuing this direction of power generation. Once again, the indicators would point clearly towards less capital outlay at the expense of our natural estate, in order to increase profit margins.

Considering the Waitaha falls into a very select group of 1% of the earth's river systems still withstanding modification from humans; does it not make sense to protect and preserve such a rare and special piece of our estate from exactly the proposed development?

Please show me the watertight case of compelling factual evidence that points undyingly to the need for a hydro generation scheme on one of the most beautiful, untouched and magical waterways in New Zealand!

The initial decision by the Minister to grant such a concession is unbelievable. When the facts are in a row it is simply undeniable that the idea of damming the mighty Waitaha and squeezing the life force from her is simply wrong. It is my river, my childrens' river and it belongs to the people, not a tiny consortium who wish to monopolise and vandalise it.

I am one of the fortunate people who has been deep into the Morgan Gorge. I have rode this river down as it opens out to the sea. To tamper with something so ancient and untouched would truly be a crime against our planet. The Waitaha is not the right river for this. Please think to the future and protect this treasure for generations to come. If a river must be blocked and drained on the West Coast then look towards the already conceded options.

The decision to grant the concessions in principle should be reversed for many reasons, including a number mentioned above, and the application for the concession declined

I do wish to be heard in support of my submission

and on behalf of my brother

Lucy Croft

From: [redacted]
Sent: Tuesday, 1 November 2016 12:00 p.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
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.

Westpower is not proposing to pay the true cost of its application. It is as if the Waitaha does not belong to anyone; therefore Westpower wants it for nothing. This is just 19th century Terra Nullius thinking.

I value the Waitaha, even if I have only visited it once. It's the hardest tramping I have ever done. I want it to remain like that. Hard. For trampers and canoeists. Not with a road in and reduced flows.

Any need to improve the reliability and security of power supply on the West Coast can be met in other ways. There are already consents granted for new power generation on the Arnold river (<https://www.trustpower.co.nz/our-assets-and-capability/power-generation/arnold>).

The project on the Arnold ought be completed before there are any grounds to even consider developing part of the conservation estate.

Yours,

Lucy Croft

From:
Sent: Tuesday, 1 November 2016 7:00 p.m.
To: Permissions Hokitika
Subject: Submission on the proposed Waitaha power scheme

Hi Pauline

I would like to make brief submission on the proposed Waitaha hydro scheme. I have spent 40 years tramping and mountaineering throughout NZ and I think the West coast valleys are a gem. I have visited the Perth and Wanganui rivers on long trips and have always wanted to head into the Waitaha Valley. The Waitaha gorge is not only a wild tramping route, but a superb kayaking run. It is simply not justifiable to destroy this unique place for a few MW of electricity. I would prefer the whole area, including the Whataroa, Wanganui and Waitaha catchments to be protected from this sort of threat - possibly by creating a new National Park. The population of the West Coast is small and meeting their power needs should not require the destruction of a beautiful river gorge.

Yours sincerely

Tel:

Lucy Croft

From: 1
Sent: Thursday, 3 November 2016 9:34 a.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
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 personally grew up in the Nelson area, and regularly explore the natural river valleys that surround my new home in Wellington. These spaces are incomparable and irreplaceable; the more significant or outstanding ones I might go as far as to call spiritually significant. It is in these areas, in the presence of strong natural forces (water, geological) that one can really be reduced, cut free from the petty and frivolous trappings of modern living. On that basis, and for the multitude good reasons provided below, I wholly oppose this project at a time when there are other options and limited demand.

I additionally 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 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 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: [redacted]
Sent: Thursday, 3 November 2016 11:57 a.m.
To: Permissions Hokitika; Maggie.Barry@parliament.govt.nz
Subject: Attention: Pauline Adams

I have been working as a raft guide in Japan for the past 3 summers. It is a terrible tragedy to see how many of the waterways here have been completely fucked by large dams and hydro schemes. The rivers are often dead, and completely drained, not to mention ugly. The salmon can't swim upstream and the entire eco-system is affected. Bear habitat is reduced to one small area in Northeast of the island I live on.

Beyond destroying its aesthetic value there can be untold damage to a river and ecosystem by installing a dam.

Do we really want to do the same to our waterways? I sincerely hope not.

Please do not put a hydro-electric dam on the Waitaha River.

Yours,

Currently in Hokkaido, Japan. I am from Athol New Zealand

Lucy Croft

From: Thursday, 3 November 2016 1:03 p.m.
Sent: Permissions Hokitika
To: Re: Waitaha River Power Proposal
Subject:

Re: Waitaha River Westpower Hydro Scheme

I oppose this development because:

1. This area is an outstanding scenic area that is valued for its wildness and lack of any human footprint. There are becoming fewer and fewer of these areas in the world.
2. This area is valued by New Zealanders and tourists alike for its wildness and its value to kayakers.
3. The area where the power plant is planning to take water from is a world class very high grade kayaking gorge. There are very few, if any other very high grade rivers in NZ. Kayakers come to NZ especially to kayak this gorge. This will increase.
4. The number of days that would be optimal for kayaking would be reduced from 51.9 to 8.8 should this water take go ahead. And would likely be at times of rising water which can be dangerous. The power supplier is not keen to co-operate with kayakers over this matter.
5. There must be other rivers that are not pristine and already have some sort of development. Lets keep development in a few areas and leave our pristine areas.

Nga mihi

On 3 November 2016 at 11:13, Permissions Hokitika <permissionshokitika@doc.govt.nz> wrote:

Hello.

Sending via email is fine.

Regards,

Lucy Croft

Statutory Support Officer

Private Bag 701 Hokitika

Department of Conservation- Te Papa Atawhai

From:

Sent: Thursday, 3 November 2016 10:21 a.m.

To: Permissions Hokitika <permissionshokitika@doc.govt.nz>

Subject: Waitaha River Power Proposal

Hello Pauline,

Can I send my letter of opposition to you via email or do I have to do it by letter?

Nga mihi

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Lucy Croft

From: [REDACTED]
Sent: Thursday, 3 November 2016 9:09 p.m.
To: Permissions Hokitika
Subject: submission to Waitaha Hydro Scheme proposal

To whom it may concern,
I am opposed to the Hydro Scheme in the Waitaha
These are the reasons of my submission:

- The Waitaha Hydro Scheme is proposed in an area which falls under the Stewardship land Act and while this matter has not been resolved a use of the area should not be permitted.
- There are sufficient other opportunities for Hydro Schemes on the coast which already have consent. I can not see reason for a proposal beyond these exciting scheme.
- Financially it is a great risk as electricity consumption is not increasing and prices are level, the viability is based on increase and rise of price.
- Biodiversity of habitat in the area will be lost. Blue ducks, bats and other vertebrates are at risk and it is not even known how the wider effect will be as fauna is not just locally effected, animals are moving and using areas at different times for different reasons. What will be lost can not fully be estimated and considered.
- There are very few free running rivers left worldwide and this river from source to ocean is significant for recreational value as well as part of our unique Westcoast landscape. It is worldwide recognized and appreciated regardless of the access possibilities for public we have a responsibility to protect these last places of wilderness in our local environment.
- Westpower as a company is mainly distributing electricity, why are they proposing such an expensive hydro scheme, how are they envisaging to get back in a very competitive electricity producing industry, when transmission lines provide a network throughout the country and localized electricity although of interest for sustainable local communities is not of need. WE will continue to pay the price for transmission lines.
- With the Amethyst Hydro Scheme sufficient electricity is produced in the South Westland area and requirements are further north where there are other hydro scheme with consent provided.

I would like to be heart at a future hearing

Lucy Croft

From:
Sent: Thursday, 3 November 2016 10:46 p.m.
To: Permissions Hokitika
Subject: Hydroelectric in Morgan Gorge

Hello,

This letter is to voice my opposition to allowing the construction of a hydroelectric power station in the Morgan Gorge area of the Waitaha river. This pristine natural environment would be ruined by the proposed project. Alternative sites that have already been heavily modified would make much more sense for the placement of such intensity. The value of the Morgan Gorge, and really the entire Waitaha river has value for kayakers both domestic and international, plus such wild and pristine places have much value to tourism and the clean and green New Zealand reputation.

Thank you for the opportunity to voice my opinion.

Best Regards,

844

Lucy Croft

From:
Sent: Friday, 4 November 2016 1:43 p.m.
To: Permissions Hokitika

Hi

Please do not dam the waitaha! It is one of the most beautiful rivers on the west coast and many many local and international people paddle the sections both above and below Morgan's gorge (and a few paddle through).

Thanks

Lucy Croft

From:
Sent: Friday, 4 November 2016 1:40 p.m.
To: Permissions Hokitika
Subject: I oppose the proposed Waitaha River hydro scheme

Dear Pauline,

I write with concern regarding the proposed Waitaha River hydro scheme and oppose this outright.

As a trumper I have enjoyed the sense of absolute wilderness once can experience tramping in the valley and Morgan Gorge area. I have walked the full valley up to Ivory Lake and recognise it to be not only unique for New Zealand, but also a precious and rare unspoiled valley with only the most spartan of recreational infrastructure, e.g. huts, tracks and bridges. This makes this a special area in New Zealand in which to seek adventure and natural beauty.

I make the following points:

- This valley and the Morgan Gorge is an important asset to New Zealand and should be preserved for future generations
- The Waitaha Valley is classed as an outstanding natural landscape by DoC
- The Morgan Gorge is classed as an outstanding natural feature by DoC

A hydro scheme in this river, however small, would destroy the sense of wilderness this valley provides to users who seek a remote experience. I add that many levels of experience are available in this valley from day tramps to multi day adventures. It supports a wide range of potential users and the trips possible here are regarded as classics by the tramping community.

Yours sincerely,

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P
T
N

Lucy Croft

From:
Sent: Friday, 4 November 2016 1:44 p.m.
To: Permissions Hokitika
Subject: Waitaha River Hydro scheme opposition submission

Dear Pauline,

I write with concern regarding the proposed Waitaha River hydro scheme and oppose this outright.

As a trumper I have enjoyed the sense of absolute wilderness once can experience tramping in the valley and Morgan Gorge area. I have walked the full valley up to Ivory Lake and recognise it to be not only unique for New Zealand, but also a precious and rare unspoiled valley with only the most spartan of recreational infrastructure, e.g. huts, tracks and bridges. This makes this a special area in New Zealand in which to seek adventure and natural beauty.

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A hydro scheme in this river, however small, would destroy the sense of wilderness this valley provides to users who seek a remote experience. I add that many levels of experience are available in this valley from day tramps to multi day adventures. It supports a wide range of potential users and the trips possible here are regarded as classics by the tramping community.

Yours sincerely,

I

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I

Lucy Croft

From:
Sent: Friday, 4 November 2016 1:46 p.m.
To: Permissions Hokitika
Subject: Waitaha submission

Dear Pauline

I am opposed to the development of a hydroelectric scheme in the Waitaha valley by Westpower.

The Waitaha valley, including Morgan Gorge, is an important and untouched wilderness area of high recreational value that is classed as an outstanding natural landscape by DoC. Other sources of energy, such as solar and wind, or other rivers that have already been heavily modified, should be considered as alternatives to this proposal.

Kind regards

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

As a keen adventurer and expert Experiential Educator I have made a choice to live in Hokitika on the West Coast of New Zealand. Westland's proximity to wilderness and varied opportunities for recreation are what inspired my choice and I believe the long term economic viability of the region will be based around its eco tourism and adventure tourism potential.

As an educator who works in a full time capacity on the West Coast training instructors, educators and eco tourism guides I understand the need for unmodified and inspirational learning environments. The Morgan Gorge is one such example. Each year I take thirty aspiring employees of the tourism industry to the mouth of the gorge.

Although the Morgan Gorge rests in the front country a visitor quickly feels isolated as they head up the track under the towering peaks of the Southern Alps into the wild, rugged and pristine backcountry. Once inside the Morgan Gorge students gain an overwhelming sense of insignificance, as the power of the environment they are in is bigger than they are. The thundering whitewater, fluted canyon walls, bowls like cauldrons and water spouts ejecting from the smooth bedrock provides an enormous amount of inspiration.

To those that know of the Morgan Gorge it is likened to that of our country's highest peak Mt Cook. The Morgan Gorge represents a pinnacle. It's a naturally significant landmark of the country of which its value is to inspire people's thinking and provide an underlying motivator for aspiration.

In future the quality of the guides and educators I train will be those who have strong connections to the natural environment and authentic stories to share with their clients.

In order for New Zealand to have a truly sustainable economy its most iconic, wild and naturally significant environments must be spared from development.

When the rest of the developed world is in the process of removing hydro schemes from its rivers why when NZ has an excess in power supply, lower power consumption than what forecasts predict, consented schemes which exist in highly modified environments in the waiting and international tourism numbers continuing to grow I ask my self why does NZ need this scheme?

Submission

Westpower is seeking concessions in the form of leases, licenses and easements, and therefore under Part 3B of the Act the Minister must be satisfied the proposed activities are both appropriate and lawful.

Under Section 17 S (2) of the Conservation Act the minister is required to consider the financial viability of the proposal. Reservations about financial viability were one of five reasons given by the Minister for declining the Fiordland Monorail application in 2014.

The financial underpinning of the Westpower Waitaha Hydro Project appears to be based on predictions of power demand that are wildly at odds with many other forecasts (See Baldwin Report DOCCM 234-5375, p 22, DOC Concession Officers Report, Section 2.14), therefore casting what can only be considered significant doubt upon the financial model used by Westpower.

Given this significant doubt, it would be inappropriate in terms of 17S (2) of the Act to impose adverse effects on conservation values* in authorising such a project. To authorise a non-viable business with such effects would be inconsistent with the Act's purpose and the Minister would therefore be at error.

Under Section 17 U (4) (a) of the Conservation Act, the Minister is not able to grant a concession when they are satisfied the activity could reasonably be undertaken in another location that is outside the conservation area in question, or where the potential adverse effects would be significantly less.

Westpower's Waitaha application fails to address alternatives to the Waitaha Scheme which include:

1. Arnold River hydro scheme
2. Stockton mine and Stockton plateau hydro schemes

The suitability of these schemes as alternatives is discussed at length in Tony Baldwin's Report (DOCCM 234-5375, Section 13, DOC Concession Officers Report, Section 2.14). Each of these schemes is already fully consented and under section 17 U (4) (a) of the Act, the Minister is therefore not allowed to grant concessions for the activity proposed by Westpower in relation to the Waitaha scheme.

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 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?

SUBMISSION:

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 request that the intention to grant be reversed and that the concession not be granted on the basis of the discussion above.

I wish to be heard in support of this submission.

Name

Signature

Date 4/11/16

Links

Department of Conservation Concession Officers Report

Tony Baldwin Report

Conservation Act 1987 (Refer Part 3B, Section 17 S-U)

* "Promote the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations."

Section 17S(2)

Where an applicant applies for

(a) a lease; or

(b) a *profit à prendre* or a licence granting an interest in land; or

(c) an easement; -

the applicant, in addition to supplying the information required by subsection (1), shall supply reasons for the request and sufficient information to satisfy the Minister, in terms of section 17U, that it is both appropriate to grant the lease, *profit à prendre*, licence, or easement and lawful to grant it.

Section 17U(4)(a)

The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing 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; or

(ii) 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; or

2 November 2016.

Submission on the proposal 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. Waitaha

I oppose the granting of this concession and wish to be heard at any hearing.

Originally from England I have lived in New Zealand since 1988 and on the same block of land in Hokitika since 1993.

Along with my partner I have built 3 businesses based in Hokitika

- Blue Spur Lodge – offered a variety of self-catering accommodation
- Wilderness Lakes – a guided fly fishing operation
- Clarke Creek Consultants Ltd. – designs, delivers and reviews emergency management training.

I have a PhD in freshwater chemistry.

I have been a Search and Rescue volunteer for over 25 years and have played a major role in SAR operations from Haast to Motueka .

The Waitaha catchment is somewhere I know well. I have tramped the entire upper Waitaha exiting via Seddon Col into the Wilkinson and out via the Whitcombe , Hokitika. I have followed the Scamper Torrent on several occasions, climbed Mt Durwood, Mt Smyth and Mt Neville. I have travelled the ridges above the Upper Waitaha, crossed from the Waitaha into the Wanganui via County Stream and the Smyth Range, visited all the huts in the Upper Waitaha more than once and have had several visits into Ivory Lake hut at the head of the catchment.

The proposal should be declined under Section 17U (2) (b) of the Conservation Act 1987 on the basis that there are no adequate methods or no reasonable methods for remedying, avoiding or mitigating all the significant adverse effects of the activity on Natural Character and Recreational values,

Intrinsic values

The DOC report has considered in some detail the effects on various aspects of the Natural Character of the Upper Waitaha but in my opinion not enough emphasis has been placed on the effect the proposed scheme will have on the broad scale landscape of the Upper Waitaha Catchment as a whole. The Upper Waitaha is fine example of a wild and scenic river running freely through rugged terrain.

In her report *Hydroelectricity or wild rivers?* (May 2012) the parliamentary commissioner for the environment points out some of the deficiencies of the reductionist approach when assessing the natural character of wild scenic rivers:

However, such dissection and classification will always be inadequate because the whole is more than the sum of the parts. The core value of a wild and scenic river lies in its relatively untouched state, in its character and integrity. Rivers that flow all the way unimpeded from the mountains to the sea are becoming rare.....

..... wild and scenic rivers are becoming increasingly scarce around the world as they are modified for flood control and used for irrigation and hydroelectricity. It is a truism of economics that increasing scarcity leads to increasing value

There is little doubt that the noted European explorer Charlie Douglas recognised the special nature of the Waitaha when he named the side creeks: Glamour Glen, Scamper Torrent, Whirling Waters, Moonbeam Torrent, there is poetry in these names.

When Crown Land tenure was reviewed in the 1980s, considerable land was categorised as 'Stewardship Land' described by a Minister of Conservation as a: "statutory holding pen – until it could be assessed and, if merited, given more precise statutory protection" it is crystal clear by anyone's standards that if this process was undertaken as intended the Upper Waitaha and its associated forests, gorges, peaks and ridges would merit a high level of protection.

All reports and assessments agree that the Morgan Gorge represents an outstanding natural feature within an outstanding natural landscape.

The Upper Waitaha is a special place.

The proposed scheme is an industrial intrusion into a much valued pristine landscape that would substantially remove the vital force of the river that has carved the magnificent Morgan Gorge. The impact of this depowering of the Waitaha is akin to an emasculation of the entire river and is woefully understated in the material presented by DOC and its consultants.

There is no appropriate mitigation available for the damage the proposed scheme will do to the Waitaha and it is my belief that the scheme should be declined solely on these grounds.

Recreational values

The recreational value of the Waitaha to the kayaking community has been well stated in various reports; however the value of this rugged pristine catchment to trampers and mountaineers has not been adequately addressed. Ivory Lake Hut at the head of the upper Waitaha was voted Wilderness magazine's Hut of the year 2016 – clearly the catchment has significant value to many back country

travellers. Tales of epic adventures in the Waitaha have been detailed in a vast range of magazine, tramping and alpine club literature. Wilderness magazine, probably the most popular of trampers' periodicals has printed many articles covering the Upper Waitaha, the currency of the Waitaha is highlighted by this year's hut of the year – Ivory Lake.

Many back country travellers aspire to traverse the Waitaha; it is a rugged pristine landscape that presents a series of demanding physical and mental challenges. Many trampers who will never make the journey to Ivory Lake will still appreciate the intactness of this special environment much as climbers will view and value peaks they will never have the skills to ascend. A trip into the Upper Waitaha would be high on the bucket list of the vast majority of New Zealand's experienced trampers.

The proposed industrial intrusion into the Upper Waitaha will significantly diminish the wilderness experience achieved by back country travellers in the Waitaha: *first pick up the track near the power station, follow this until you come across the intake weirs and tunnels into which much of the river is diverted – you have now reached Kiwi Flat, first hut in the Upper Waitaha.*

Flora

Colin O'Donnell states in his report to DOC:

"The survey area is considered to contain areas of significant habitat for indigenous fauna based on assessment of guidelines/criteria for significance set out in the West Coast Regional Policy Statement 2000 (the RPS) (West Coast Regional Council 2000) and the Westland District Plan 2002 (the WDP) (Westland District Council 2002). The survey area has high natural heritage values based on assessment criteria in the West Coast Conservation Management Strategy 2010-2020 (the CMS) (Department of Conservation 2010). The RPS and WDP criteria are for the purposes of Section 6(c) of the Resource Management Act 1991 (RMA), whilst the CMS criteria are for the purposes of integrated conservation management of natural and historic resources under the Conservation Act 1987." (Wildlife Surveys Ltd 2014)."

"In the context of Natural Heritage policies of the CMS, and as stated in the Wildlife Surveys Ltd (2014) report, the site triggers significance under all the Representativeness, Diversity, Intactness, Viability, Threatened Species and Habitat and Taonga species and Habitat criteria."

We are undoubtedly dealing with an area that has significant biodiversity and conservation values. These high conservation values are inextricably linked to the intact unmodified nature of the vegetation. The proposed scheme will necessitate the permanent destruction of 3.5 ha of this valuable habitat along with the implications such a loss will have on the surrounding area.

In her report on terrestrial ecology Jane Marshall states: *"I agree with the conclusion of ecology report that the project will not have a major impact on the values identified but it will result in an overall loss of conservation value if no compensation is provided."*

The loss of 3.5 ha of intact forest will surely result in major loss of conservation values in the Waitaha in particular and also on a wider scale as this industrial intrusion into an outstanding natural feature within an outstanding natural landscape would set a destructive precedent for future developments.

How could any compensation mitigate this loss of conservation value?

The proposal should be declined under 17U(2)(a) of the Conservation Act 1987 on the basis that the information available is insufficient or inadequate to enable him or her to assess the effects (including the effects of any proposed methods to avoid, remedy, or mitigate the adverse effects) of any activity, structure, or facility;

Fauna.

Blue Duck.

Andrew Grant of DOC states:

- *“various catchments maybe integral in the meta population but this relationships and the various contributions or dependencies of the other catchments is not well understood. Is the influence of this hydro development wider than just the Waitaha catchment?”*
- *I am not convinced that the reach where water flow will be reduced, the Morgan Gorge, is not important for blue duck and I feel more work is necessary to determine the role this areas plays for the Waitaha blue duck population and the wider blue duck meta population.”*

The impact of the scheme on this threatened iconic bird species is altogether uncertain. We do not know the relevance of the Morgan Gorge to Whio at present so are in no position to judge the potential effects of the power scheme.

Similarly the effects of the weir, an untested technology, on ducklings are also unknown.

The suggested mitigations of scaring off the birds prior to blasting, operating an egg removal programme or funding a captive breeding programme seem nonsensical when compared with protecting and preserving their natural environment.

We do not know enough to appropriately assess the risk to Whio populations.

Lizards

DOC'S technical advisor ecology J Marshal

- *No lizards were found during the brief field search at appropriate sites in the proposed footprint but it is highly likely that two At Risk lizard species and likely that a Nationally Vulnerable gecko occur within the footprint.*
- *The footprint is said to be of no more than local value to lizards because of their widespread, low density distributions within a vast habitat. This is not the case if the Westland green gecko or a unique clade of the speckled skink is present.*

The reports emphasise the difficulty of finding lizards but clearly believes they are present.

As DOC is entirely unsure of what species are present and in what numbers, it is clear that they are in no position to assess the risk the scheme poses to the resident lizard population.

Mitigation suggested during construction is unworkable. If expert searchers found no lizards during a 10 day search how could one reasonably expect contractors to find lizards as the bulldozers move in, the lizard salvage scheme will not work.

DOC considers that the likely presence of a threatened gecko species and total removal of less well represented "At Risk" skink habitat would be considered to be a significant local negative effect and potentially a nationally significant negative effect and would cause a loss of biodiversity values.

We do not know enough to appropriately assess the risk to lizard populations.

Koaro

Both the Department and Westpower's consultant agree that there is a level of uncertainty that remains regarding the long term effects of the scheme on the koaro population upstream of Morgan Gorge and 'At Risk' native fish in the abstraction reach.

The effect of the weir and intake on aquatic populations is largely unknown and the proposal takes a monitor and evaluate approach.

We do not know enough to appropriately assess the risk to Koaro and other at risk fish populations.



The remote Ivory Lake Hut has been voted 2016 Hut of the Year! Photo: Mark Watson
Wilderness Magazine

The proposal should be declined under Conservation General Policy 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.

(d) Utilities should, wherever possible, be located in, or added to, an existing structure or facility and use existing access options.

The proposal should be declined under 17U(4) of the Conservation Act 1987 on the basis

The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing 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; or

(ii) 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; or

(b) could reasonably use an existing structure or facility or the existing structure or facility without the addition.

The purpose of the proposal is to generate electricity from a hydro power scheme on the Upper Waitaha River.

Westpower's Amethyst hydroelectric scheme on the tributary of the nearby Wanganui river will, according to Westpower, generate enough power to service South Westland well in to the foreseeable future. Additional power, if and when needed, will most probably be required in the northern areas of the region i.e. Hokitika, Greymouth and Westport.

Additional power to central Westland could come from the already consented upgrade to the Arnold River scheme that would surely become economically viable once the power is actually needed.

Further enhancement of other local hydro schemes such as Lake Kanlere and Dillmans either through increased water usage or operating efficiencies could supplement the power supplied from the Arnold River upgrade.

For northern Westland the recently revitalised HDL scheme at Stockton has the added value of not only generating considerable power but also treating acid mine drainage in a sustainable and environmentally sensitive manner.

I note also that the Energy Consultant Tony Baldwin throws considerable doubt on the economics of the Waitaha scheme.

I am supporter of the move to sustainable power generation in general and in particular run of the river schemes like the Westpower owned Amethyst hydro power plant on a tributary of the Wanganui River South Westland. I also support local business development using and working with local resources wherever possible and appropriate – I've been there myself!

The environmental cost of the proposed Waitaha scheme appears to me to be way past the threshold of what DOC should be consenting to. It would be a different case if there was a desperate need for power generation in South Westland. How can DOC allow the emasculation of a wild scenic river for a power generation scheme that could be effectively and efficiently located elsewhere?

November 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.

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!

As a kayaker of over 30 years I doubt like many I will ever paddle Morgan Gorge given the commitment and skills required yet this not a reason to lose this section of river. It sits as a pinnacle of what is possible in a whitewater kayak, a goal for the very best on a good day but not an absolute impossibility.

New generations of paddlers need goals like Morgan Gorge to fuel the commitment and desire to achieve at the top level of our sport.

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: November 5, 2016

Lucy Croft

From: [redacted]
Sent: Sunday, 6 November 2016 9:44 p.m.
To: Permissions Hokitika
Subject: Waitaha River concession for Westpower

I wish this to be declined.

This is a unique part of New Zealand and other users will be prevented from using it just so some company can make profits.

At 20 MW it is so small that it doesn't even warrant getting as far as it has.

There are other previously consented schemes on the Westcoast (such as Arnold) that would destroy on a small fraction of what this scheme would.

Plenty of opportunity in the South Island to do PV or wind before we wreck DOC areas.

Very surprising that this has even progressed this far.

Regards

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:**

Phone: ' 2
Email: s ail.com

CONCESSION APPLICANT DETAILS:

Applicant's name: Westpower Limited
Proposal: Waitaha Hydro Scheme

Details of application:

Westpower run-of-the-river hydro scheme at the Morgan Gorge on the Waitaha River on Department of Conservation (DOC) stewardship land.

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 hydro scheme should not go ahead as it is not in the best interest for future generations of New Zealanders. As a young Kiwi, the thought of another river of national significance being lost for debatable economic benefit, is despicable. When is enough enough? Of course economic gain now is important, but how will this benefit our future generations?

As a passionate whitewater kayaker, I have had the privilege to experience some of New Zealand's untouched river gorges and the prehistoric beauty they contain. With many of these places already destroyed, it is paramount that we protect the last few at all costs. Access to these places remind us of how unique our country is and builds connections to the land. It is this connection to the land that makes us Kiwi- why would we damage it? Even if only a small number will ever enter Morgan Gorge, protecting these places purely because they still exist, is what matters to future generations.

By granting permission for the Morgan Gorge scheme, DOC has failed in it's obligation to protect this area of land until it's destiny is determined. Stewardship land is held for the purpose of protecting natural and historic resources. How is the implementation of a marginally beneficial hydro scheme, at the complete destruction of the wilderness value, protecting natural or historic resources? Once the scheme is implemented, the destiny is determined. This is not the destiny that the next generation in New Zealand want!

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:

- is incompatible with the Outstanding Natural Feature status of the Morgan Gorge and Outstanding Natural Landscape 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
- New Zealand has sufficient power generation therefore the potential benefit from the scheme does not outway the loss in wilderness value.

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: November 6, 2016