

<b>Date</b>	23 February 2026
<b>To</b>	Waitaha Hydro Expert Panel FTAA-2505-1069
<b>From</b>	Mason Jackson
<b>Project advice provided for</b>	Waitaha Hydro Scheme
<b>Qualifications and Code of Conduct</b>	Provided to the Panel on 21 January 2026
<b>Documents referred to</b>	<ul style="list-style-type: none"> <li>• Minute #8 Statement Recreation</li> <li>• Minute #8 Statement J Head LANDSCAPE</li> </ul>
<b>Signature</b>	

## 1. Introduction

- 1.1 My name is Mason Jackson. I prepared the Waitaha Hydro Substantive Application (the “**Application**”) for the Waitaha Hydro Project (the “**Project**”).
- 1.2 I attended the empanelment hearing on 13 February.
- 1.3 I have been asked by the Applicant to provide responses, as relevant, to resource consent conditions matters contained in the following documents prepared by the Department of Conservation’s (“**DOC**”) technical advisors which I have read:
- (a) Minute #8 statement dated 19 February 2026 prepared by Shelly Sidley (the “Recreation Statement”); and
  - (b) Minute #8 statement dated 19 February 2026 prepared by prepared by Jeremy head (the “Landscape Statement”).

## 2. Consent conditions regarding operational in-stream excavation of bed material above or adjacent to the Headworks

- 2.1 First, for the Panel’s benefit, I highlight that the Final Weir and Intake Structure Design Report, required in accordance with conditions 2 and 3 of Part C9 of the consents, must include information that confirms that the

structure will “manage and pass bedload sediment”. In achieving this requirement, the Applicant will incorporate the outcomes and benefits associated with undertaking additional CFD modelling during the detailed design phase which were discussed during the empanelment hearing. Accordingly, this information will also form part of WCRC’s consideration during their design certification process as set out in Condition 3 of Part C9 of the consents.

2.2 At page 2 of the Recreation Statement (3<sup>rd</sup> paragraph), Ms Sidley recommends that *“conditions be imposed requiring measures that maximise public information and provide the greatest practicable advance notice of planned excavation activities”*.

2.3 In this respect, I note that Westpower suggested that the following additional condition is included in the Public Safety section of the West Coast Regional Council Consent conditions (Part C of the consents)<sup>1</sup>:

*“Following the Commencement of Generation, the consent holder must implement and maintain a communication method, via a website, that provides the public with information on times when the physical excavation of bed material is being undertaken above or adjacent to the Headworks.”*

2.4 In my view, the obligation set out in the new suggested condition is a practicable response to mitigate the concerns raised by Ms Sidley. Given it is not possible to predict with certainty when manual excavation will be required, all Westpower can do is use all reasonable endeavors to provide and make this information available to the public as soon as reasonable. I have included some additional suggested wording in this condition below to highlight this (refer to red text).

*Following the Commencement of Generation, the consent holder must implement and maintain a communication method, via a website, that provides the public with information on times when the physical excavation of bed material is being undertaken above or adjacent to the Headworks.*

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<sup>1</sup> Appendix A of Westpower Memorandum #12

*The consent holder must use all reasonable endeavours to ensure information is promptly available to the public via the website following any decision being made to physically excavate bed material above or adjacent to the Headworks.*

- 2.5 I consider that, without being unnecessarily prescriptive, the above suggested amendments also address similar concerns raised by Mr Head. Mr Griffiths in his statement of evidence dated 10 February 2026 also said there is a DOC website relating to the Kiwi Flat Hut which could be linked to Westpower's updates in the "Know before you go" section.<sup>2</sup> While that may increase the visibility of the notice, as access to and use of that website (and links) is beyond Westpower's control, I do not consider it can be conditioned.
- 2.6 On pages 2 and 3 of the Recreation Statement (from paragraph 4), Ms Sidley supports the conditions I proposed in Westpower's Memorandum # 10 that require Westpower to annually report the frequency, duration, and spatial extent of in-channel maintenance works<sup>3</sup>, but considers that this monitoring and reporting should also be linked with a review if the frequency of excavation events exceeds predicted levels (as recommended by Dr Tunnicliffe).
- 2.7 This is achievable and Westpower has accepted linking the monitoring and reporting requirements to a potential "action". This aligns with Westpower's commercial imperatives as it is incentivised to minimise blockages as they result in periods of no generation. Rather than align it to a consent review as mentioned by Ms Sidley in her statement dated 19 February 2026 (which I take to mean a s128 review), I consider a specific review provision tied to the SOMP review is most effective and efficient. I suggest the following amendments to Part B of the consents to achieve this (deleted text is denoted by red strike-out font and new text denoted by red font):

#### ***Site Operations and Maintenance Plan***

*23. The objective of the SOMP required by Condition 5 of Part B of these conditions is to set out the operational practices and procedures to be adopted to ensure ~~compliance with~~ all relevant operational conditions of the Consents are complied with and adverse effects on neighbours and their*

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<sup>2</sup> [Attachment-9-Statement-Rodger-Griffiths\\_Redacted\\_redacted.pdf](#), at para 8.

<sup>3</sup> Conditions 23(a) and 26 of Part B of the consents

*property, the wider community including recreational users of the Waitaha Valley and the receiving environment resulting from operational and maintenance activities within the Project Site are minimised and appropriately avoided, remedied or mitigated.*

*The SOMP must include:*

- a) General site operations, monitoring, and maintenance procedures for the Project Site including standard operating and maintenance procedures for:
  - (i) Controlled (planned) Power Station start-up and shut-down;*
  - (ii) Unplanned Power Station trip events;*
  - (iii) Ensuring ongoing downstream passage of sediment past the Headworks and ensuring the occurrence of “clogging” events at or near the Headworks requiring instream sediment excavation works is minimised;*
  - (iv) Monitoring of the frequency, duration, and spatial extent of in-stream sediment excavation works required above the Headworks;*
  - (v) Discharging sediment through the desander sluicing pipe at the tailrace of the Power Station including the timing and duration of such discharges;*
  - (vi) Establishing no-take days in accordance with condition 46 of Part C9 of these consents, including processes used to communicate and co-ordinate the use of them to/with relevant recreational users; and*
  - (vii) Other routine instream maintenance works;**
- b) Measures and actions to respond to warnings of heavy rain;*

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*The consent holder must review the SOMP at least once every 5 years following the Commencement of Generation. Any amendments made to the SOMP must be certified in accordance with Condition 11 of Part B of these conditions.*

### ***Instream Works Review Report***

24. *If, for each consecutive 5 year period following the Commencement of Generation, the average annual frequency of in-stream sediment excavation work events undertaken above the Headworks exceeds 15, then, as part of the 5-yearly review of SOMP required by condition 23, the consent holder must prepare an Instream Works Review Report and provide it to WCRC and WDC for their certification no later than three months following the end of the relevant 5 year SOMP review period. The purpose of the Instream Works Review Report is to identify practicable measures for minimising the frequency of in-stream sediment excavation work events. As a minimum, the Instream Works Review Report must include the following:*

- (a) A detailed analysis of the likely root causes for all in-stream sediment excavation events recorded within the 5 year SOMP review period;*
- (b) If the root causes are not considered "unique" to the preceding 5-year period, a detailed review of the Headworks operating procedures set out in the SOMP to identify potential operational and/or set-point changes that could reduce the average frequency of in-stream sediment excavation events;*
- (c) A summary of other options considered to reduce the average frequency of in-stream sediment excavation events; and*
- (d) Any recommended changes to the operating procedures set out in the SOMP and/or any recommended physical changes to the headworks structure including any technical information to support any recommendations made.*

*Following the certification of the Instream Works Review Report, any related amendments made to the SOMP must be separately certified in accordance with Condition 11 of Part B of these conditions and any related changes to the headworks structure must be certified in accordance with Condition 4 of Part C9 of these consents.*