

Attachment 12 to Memorandum #7: Statement of David Jan Derks

Date	21 January 2026
To	Jon Bright, Project Director – Waitaha Hydro Scheme Westpower Ltd
From	David Jan Derks
Project advice provided for	<i>Waitaha Hydro Scheme</i>
Documents referred to	<i>Waitaha Hydro Scheme Substantive Application Appendix 20 Vegetation report</i>
Signature	

1. I authored Appendix 20 Vegetation Report and was involved in the preparation of the Vegetation Management Plan appended to the Application.¹
2. I have provided further information on the following matters in response to comments made by the Department of Conservation (**DOC**), and landowners Tawhiri Matea Ltd and Granite Developments Ltd.
3. I address:
 - (a) obtaining supplementary planting material from the West Coast vs. strict eco-sourcing (as requested by DOC);
 - (b) why natural regeneration is anticipated relatively quickly at the site of Construction Staging Area 1 (and at other places); and
 - (c) what effects the Project might have on pests (in this case wild animals, specifically deer and pigs).
4. There are no changes to my report.
Sourcing supplementary planting material.
5. In DOC's s 53 comments, with tracked changes proposed resource consent conditions, DOC have made the following request and statement:²

¹ [Appendix-20-vegetation-report.pdf](#); and [Appendix-35-vegetation-management-plan.pdf](#)

² DOC s 53 comments Attachment A, comment inserted at condition 37.

37...e) The use of **locally genetic sourced native vegetation** ~~West Coast sourced indigenous plants~~ for any new plantings required as part of Rehabilitation Works.

6. I understand this to mean DOC's position is that only material from the locale of a site to be supplementary-planted or only from the ecological district in which the site(s) occur (this is commonly referred to as eco-sourcing).
7. I consider that insistence on strict eco-sourcing is overly restrictive on an ecological basis in the case of vegetation proposed for the Project's supplementary planting work.
8. I do not consider there to be any ecological benefit of prescribing eco-sourcing from the specific locale of the Project or limiting it to the Wilberg Ecological District, because the vegetation concerned is not unique and restriction to an ecological district is an arbitrary constraint and not necessarily practical. Further:
 - (a) the nature and type of vegetation in the Project area, including the range of species proposed for supplementary planting, occurs in neighbouring ecological districts and similar situations in West Coast catchments further removed from the Project locale;
 - (b) there is not expected to be any genetic difference between individuals of a species relevant to Project planting work between the neighbouring ecological districts; and
 - (c) in any case cross-boundary propagule transport by natural means seeds/spores moving between ecological districts occurs for a variety of species and may involve substantial distances e.g., by bird, air or water dispersal.
9. While sourcing material for at least some propagation and supplementary planting from the Project's locale may be considered and undertaken on a best endeavours basis, retaining flexibility for sourcing is supported and will not have an adverse effect on the indigenous vegetation of the planted area or surrounding areas.
10. I acknowledge DOC's disagreement with my view, that growth rate will differ between locally genetic sourced native vegetation and West Coast sourced indigenous plantings. I retain my view.

Factors supporting the occurrence, establishment, and timing of natural regeneration, and rationale for reliance on it.

11. DOC has raised concerns about the landscape and natural character effects at the Morgan Gorge Headworks. Mr Bentley has discussed in his response to the Panel that revegetation is a treatment applied by the Landscape Management Plan to reduce those effects. The assessment in my report considered Construction Staging Area 1, including the Morgan Gorge Headworks.
12. Relevant context is:
 - (a) Regeneration refers to establishment and survival of seedlings at a stocking (density and distribution) likely to result in replacement by similar cover to that present prior to clearance – it does not imply fast growth of vegetation to mature stature.
 - (b) Supplementary planting does not achieve a mature cover stature or more rapid growth either, the only potential gain being time from seed germination to seedling height growth to the equivalent of a planted seedling by a natural regenerated one.
 - (c) A key advantage of natural regeneration is that a wider representation of species is likely to result in their favoured microsite locations than supplementary planting generally achieves given variety/range of species likely to be practical to include in any planting programme being substantially less than the natural range/diversity present.
13. The expectation that natural regeneration should occur relatively quickly at Construction Staging Area 1 is based on the:
 - (a) vegetation type(s) present (and the others at other Project component sites) are naturally resilient;
 - (b) scale and nature of Project disturbance is small and not inconsistent with that of natural disturbance events that have occurred and can be expected to continue to occur in the Project's environs e.g., slips, and stream course alterations that remove vegetation, resulting in bare substrate and subsequent revegetation;
 - (c) retention of the existing vegetation in its current state surrounding the proposed clearance area provides a seed/spore source in close

proximity to all parts of it, at most being approximately 25 metres, and that includes the range of vegetation components (tree, shrub hardwood, tree fern, fern, monocot and herbaceous) and species present at the site;³ and

- (d) The proposed mitigation measures of scarification of compacted surfaces, and monitoring/control of any weeds, are actions expected to promote/advance timing of natural regeneration.

Opinion on possible Project effects on ungulates

Deer

- 14. In my experience (based on more than 50 years of observations from working in forest operations and hunting in the local area and wider afield:
 - (a) The proposed Project activities are not expected to cause deer to move out of or stay away from any area they currently frequent or inhabit except where an activity has a direct effect on a given site e.g., the actual Project's components footprint, or in very close proximity to this (possibly within a few tens or at most hundreds of metres). For example, it is not uncommon to observe deer that already inhabit environs around sites of recent forest road/landing construction close to and on those sites within days, or as recently as overnight.
 - (b) Other factors than proposed Project activities or its existence post construction are likely far more important influences on choice and duration of area occupancy by deer, these including:
 - (i) food availability, concomitant with population density;
 - (ii) cover/shelter;
 - (iii) breeding opportunities (seasonal); and
 - (iv) hunting pressure.
 - (c) Given these influences, it is extremely unlikely that the Project would have a marked effect on deer presence in the Project environs, other

³ The same applies to natural regeneration in other Project proposed clearance areas where seed/spore sources are in close proximity, the exception being Construction Staging Area 2 and the power station site, hence the recommendation for some supplementary planting there.

than very close to or within construction and permanent occupancy areas, and then only temporarily.

Pigs

15. The same observations on the key influences on the population movements, expansion or diminution of pigs apply as for deer. An added factor is liberations by pig hunters, which may be an influence. No changes in status of these key factors, or possible pig presence expansion or site occupancy changes are expected to result from proposed Project activities.

David Jan Derks