



# Recreation Assessment Peer Review: Appendix 28

FTAA-2506-1069 Waitaha Hydro

**Prepared for Waitaha Hydro Expert Consenting Panel**  
27 January 2026

Tēnā koutou katoa

This report has been prepared for the Environmental Protection Authority by Paul Wilson from Xyst Limited.

#### Revision History

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## INTRODUCTION

1. Westpower Limited (WL) has applied for approval under the Fast-track Approvals Act 2024 for the construction and operation of the Waitaha Hydro Scheme project and has submitted an assessment of environmental effects as they relate to recreation as part of the application.
2. The Waitaha Hydro Expert Consenting Panel have been appointed to consider and decide on the application. I was engaged by the Environmental Protection Authority (EPA) to provide a peer review of Appendix 28: Westpower Ltd Proposed Waitaha Hydro Scheme Assessment of Environmental Effects Recreation (June 2025) prepared by Rob Greenaway, R&R Consulting (NZ) Ltd (Mr Greenaway).
3. I have also been requested to review and provide advice to the panel in response to the following:
  - Waitaha Hydro Project - FTAA-2505-1069 – s51 FTAA covering report – Department of Conservation
  - Recreation Technical Report – Department of Conservation Re: Waitaha Hydro Scheme: Technical Advice to inform S51 and S53 reports – November 2025
  - comments from the New Zealand Conservation Authority in relation to the Waitaha Hydro Application
  - comments from the West Coast Tai Poutini Conservation Board in relation to the Waitaha Hydro Application
  - s53 comments from DOC
  - Appendix A being DOC's comments on conditions
  - Appendix B being DOC's questions to Westpower and their subsequent responses
  - Memorandum #7: Attachment 10 Statement of Rob Greenaway, 21 January 2026, and Attachment 11 Statement of Michael Copeland 21 January 2026.
4. I have conducted a peer review to evaluate how potential recreational effects were identified and assessed, and whether suitable methods were used in the assessment.
5. I have not visited the site or undertaken my own assessment of recreation values present.

## Qualifications and experience

6. My full name is Paul Kimble Wilson. I am a Director of Xyst Limited which is a parks and recreation consultancy based in Christchurch.
7. I hold the qualification of Diploma of Parks, Recreation and Tourism Management from Lincoln University (1987) and Post Graduate Certificate of Applied Science (Lighting Design) Massey University (2010).

8. I have 37 years' experience in recreation planning and management of public open space including roles with the Department of Conservation, Auckland City Council, Queenstown Lakes District Council and Xyst Limited.
9. I am an Accredited Recreation Professional of Recreation Aotearoa (the New Zealand Recreation Association) and Certified International Parks Professional (World Urban Parks). I am a member of the New Zealand Association for Impact Assessment and Illuminating Engineering Society of Australia and New Zealand.
10. I was appointed to the inaugural Sport NZ Sir Edmund Hillary Outdoor Recreation Council in 2009 – 2013 and was awarded the President's Award by Recreation Aotearoa in 2012. I served as the Chairman (Asia Pacific) of the International Federation of Parks and Recreation (2009 - 2011).

## DESCRIPTION OF PROPOSAL

### Description of the Project

11. The proposal is to develop a hydroelectric scheme in the Waitaha River to provide renewable energy, including:
  - constructing, operating, and maintaining a weir to divert a portion of the Waitaha River into an approximately 1.5 kilometre tunnel to convey water to a powerhouse
  - constructing and maintaining an access road
  - a 66 kV transmission route, conveying power from the scheme to the distribution connection point on State Highway 6.
12. The proposed project is located within the true right bank of the Waitaha River, between the lower end of Kiwi Flat and Macgregor Creek within Waitaha Valley, south of Hokitika.

### Description of the existing environment

13. To determine the likely effects on recreation from the proposal, it is necessary to specify the geographical extent of the activity and its potential effects on recreational users. The potentially affected recreation area was defined by Mr Greenaway as the entire Waitaha Catchment which is appropriate.
14. Terrestrial access to the Upper Waitaha Valley is accurately described, including the requirements, for landowner permission to cross private land to access the public conservation estate in accordance with the Conservation Covenant between the landowner and the Department of Conservation.

15. Levels of recreational use are described for tramping and hunting in the Upper Waitaha Valley are predominately based on reported levels of use from the Remote Huts website updated to around 2022<sup>1</sup> and analysis of hut books undertaken by Mr Greenaway in August 2024.
16. The current description of Ivory Hut on the Remote Huts website would indicate a potentially higher level of use than previously described. As of December 2025, the website states “The hut is difficult to access by any route and visitations were historically low. They picked up significantly due to the increased profiling that took place in the early 2000s, and the place gets very busy now at times, mostly around the New Year period.”<sup>2</sup>
17. Mr Greenaway acknowledges that “while hut book numbers are not a reliable means to measure numbers, figures show a base level of use” and that hut book data should only be treated as “indicative”. There has been no calibration of hut book records with actual observations of users, so as noted by Cessford & Burns (2008)<sup>3</sup>, the reliability of hut books as a method of estimating use can be highly variable. Reliance on hut book numbers as a means of estimating use can therefore only be considered indicative.
18. Mr Greenaway has not applied any mathematical formula to adjust recorded hut book numbers to reflect actual use as there is no reliable observational data to enable useful calibration. Rather Mr Greenaway has taken a conservative approach to estimating numbers based on the available historic information sources which I support.
19. Mr Greenaway also utilises data from the social media/activity tracking application Strava to provide evidence of routes used by recreationists who use Strava. Mr Greenaway discusses the limitations of the use of the application and has used Stava heatmaps to only indicate the likely route for walking access into Kiwi Flat from the lower Waitaha Valley in his assessment which is appropriate. (p28-29). I have reviewed the current Strava heatmap data available for the full year 2025 and it is consistent with the heatmap provided by Mr Greenaway of the route taken by pedestrians on the access between the Waitaha Valley road-end and Kiwi Flat Hut (for the 12-month period up to April 2025).<sup>4</sup>
20. I have also reviewed available Stava Metro data for 2023, 2024 and 2025 in the vicinity of the Kiwi Flat swing bridge which shows 10 (2023), 25 (2024) and 15 (2025) Strava users who opted into sharing their activity data made trips to the area each year<sup>5</sup>. This data cannot be used to identify the number of users to the area but does indicate use is relatively low and is not inconsistent with other data used by Mr Greenaway.

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<sup>1</sup> [www.remotehuts.co.nz](http://www.remotehuts.co.nz)

<sup>2</sup> <https://www.remotehuts.co.nz/ivory-lake-hut.html>

<sup>3</sup> Monitoring visitor numbers in New Zealand national parks and protected areas A literature review and development summary Gordon Cessford and Rob Burns. p.16

<sup>4</sup> See Appendix 1 – Strava Metro data

<sup>5</sup> See Appendix 1 – Strava Metro data

21. Levels of recreational use by jetboaters and kayakers are described and supported by historic evidence.
22. Canyoning is described by Mr Greenaway as a recent activity with “potential to continue and grow into the future”. A February 2025 publication by the New Zealand Canyoning Association (CANZ), “Guide to the Waitaha Valley Canyons” supports Mr Greenaway’s statement regarding the potential growth of this activity which, except for visits to the Morgan Gorge Hot Springs, occurs upstream of Kiwi Flat Hut.
23. The assessment of estimated use arrived at by Mr Greenaway is approximately 50 whitewater kayakers and 300 trampers and canyoners and day visitors to Kiwi Flat Hut and 50 hunters in the Waitaha valley area annually.
24. Overall, I consider Mr Greenaway’s description of the existing environment and assessment of recreational user types and estimates of level of use to be sound and supported by the available evidence at the time.

## Description of activity with potential to effect recreation

25. I generally agree with Mr Greenaway’s assessment of the effects on recreation by the activities proposed being (i) changes to recreation opportunities, and (ii) changes to recreation values.
26. The placement of weather monitoring infrastructure at Waitaha Gorge, Moonbeam Hut and Scamper Torrent will however introduce additional infrastructure to remote backcountry areas, and as noted by the Department of Conservation, these effects will not be merely perceptual and should, in my opinion, have been included in Mr Greenaway’s assessment of effects.<sup>6</sup>

## Conservation Management Strategy

27. A review of the CMS is included as it relates to the Project noting “the CMS plans for maintaining a backcountry-remote recreation experience within the Waitaha study area.” (D.18 p41).
28. Mr Greenaway concludes that “The installation of hydro development structures will be incompatible with the preferred management setting characteristics described in the DOC CMS. However, the outcomes set out in the CMS for the Hokitika Place will still be achieved with the Scheme in operation.” (F.44 p83)

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<sup>6</sup> RECREATION TECHNICAL REPORT – DEPARTMENT OF CONSERVATION Re: Waitaha Hydro Scheme: Technical Advice to inform S51 and S53 reports – November2025.p12

29. I agree with Mr Greenaway's assessment that the Project will be incompatible with the preferred management setting characteristics described in the DOC CMS. I generally agree that the outcomes set out in the CMS for the Hokitika Place could still be achieved with the scheme in operation but note that the CMS outcome for the Hokitika Place states "Concessions may be granted for regular aircraft landings within the backcountry-remote zone where adverse effects on conservation values, recreational users, remote or wilderness values can be avoided or otherwise minimised. Regular landings may occur for the purpose of positioning backcountry recreationists (including hunters, rafters and kayakers) or for scenic landings (including scenic snow landings)"<sup>7</sup>. Concessions for regular landings for other purposes were not contemplated in the CMS outcome for the Hokitika Place.

## RECREATIONAL EFFECTS ASSESSMENT

### Values assessment

30. I agree with the values assessment undertaken for the Waitaha Study Area but note that CANZ have recently graded the Whirling Water Canyon as "\*\*\*\* Canyons of International Significance" under its grading system. CANZ have graded the Bartum Creek Canyon "of national significance" and the Scamper Torrent as "of regional significance".<sup>8</sup> Mr Greenaway noted that CANZ has assessed the Whirling Water Canyon as nationally significant.
31. Overall, I consider Mr Greenaway's values assessment to be well considered, and the criteria used appropriate.
32. I support Mr Greenaway's conclusion that low use does not equate to low value. (5.1 p.24)
33. Mr Greenaway has utilised "a seven-point level of effects assessment from very low, low, low-moderate, moderate, moderate-high, high and very high" to assess the level of effects.
34. As stated by Mr Greenaway, "there are no nationally-accepted criteria for identifying the significance of recreational values". The approach adopted has been to (1) identify the recreation values of the area, and (2) assess the significance of these values. Mr Greenaway has based his assessment on four values being:
- a. Use (represented by the numbers, activities and origins of users)
  - b. Setting attributes
  - c. Experiences (sought and attained)
  - d. Availability of substitute resources

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<sup>7</sup> West Coast Conservation Management Strategy Volume 1, DOC 4.2.6.7 p246,247

<sup>8</sup> <https://www.kiwicanyons.org/our-canyons/grading/> and <https://www.kiwicanyons.org/wp-content/uploads/2025/01/Guide-to-the-Waitaha-Valley-Canyons-11-Feb-2025.pdf> (page 10)

35. Other values, being the “existence value” and the “option value” that may be applied to the recreation setting were excluded by Mr Greenaway on the basis that in “absolute and relative terms, their complete evaluation would add little to this analysis” (E.5 p69). I agree that evaluation of the existence value and option value of a resource would be problematic while nonetheless acknowledging the importance of these intrinsic values to many people.
36. As discussed above, I agree with Mr Greenaway’s description of the use (low), setting (backcountry-remote) and experience (remote, challenging).
37. Mr Greenaway’s assessment of the uniqueness of the Waitaha Valley is that it is “one of many backcountry-remote settings on the West Coast, almost all of which are accessed by river valleys, the Waitaha differs by having relatively difficult access in the lower reaches and poorly formed tracks (or none) in the upper valleys”. (E.21 p72). This would seem at odds with earlier statements that one of the unique attributes of the Waitaha Valley is “ease of access (a relatively short tramp in/out between Kiwi Flat and the road end)”. Mr Greenaway states that Interviewees in the Booth (2008) assessment described the experience as “accessible remoteness” and this is likely the best description of the unique qualities of the Waitaha Valley.

## Significance assessment

38. Mr Greenaway provides a well-structured rating system for the assessment of significance in terms of geographical scale. I agree with his statement that “The number of setting users is not a strong or single determinant of significance.” (E.24 p73).
39. Mr Greenaway has undertaken separate assessments of significance for the various recreational user groups and a summary of these, along with proposed mitigation measures, are set out in Table 1; Scheme effects and mitigation summary (4.1 p.21). I agree with his assessment of significance in terms of geographical scale but note that the New Zealand Canyoning Association considers the Whirling Water Canyon as a canyon of International Significance.

## Effects assessment

40. In paragraph 3.3 of Mr Greenaway’s report states, “in relation to the levels of effects, a seven-point level of effects assessment from very low, low, low-moderate, moderate, moderate-high, high and very high has been applied.” (3.3 p14) and this has been used to summarise the results of his assessment in Table 1: Scheme effects and mitigation summary (4.1 p21). However, the scale of effects used in the written assessment (Appendix F and as described in F.21) is a **five** point scale consisting of nil, low, moderate, high and significant.
41. For example, the effect of the Project on the kayaking opportunity between Morgan Gorge and Douglas Creek is assessed in paragraph F.30 as “high” using the five-point scale whereas it is summarised in Table 1: Scheme effects and mitigation summary (4.1 p21) as “Very high”. In Memorandum #7: Attachment 10 Statement of Rob Greenaway, 21 January 2026, Mr Greenaway states in paragraph 6 that “For example, as summarised in my Table 1 (paragraph 4.1), my finding of ‘high’ adverse operational effects relate to recreation values, and therefore apply to all recreational visitors to the defined settings, including all white water kayakers.”. Mr Greenways finding as summarized in Table 1 (paragraph 4.1) actually states “Very high”.

42. Mr Greenaway's five-point assessment scale provides a well-structured rating system for the assessment of effects on both recreation opportunities and values supported by clear criteria. Although I note the discrepancy in scales used, which should be clarified, I generally agree with Mr Greenaway's evaluation of how the scheme affects recreation, as outlined in Appendix F using his five-point scale.

## MITIGATION OF EFFECTS

43. The mitigation measures proposed by Mr Greenaway include:
- a. Changes to access for route users away from the power station site during construction and operation.
  - b. Provision of information relating to construction activity.
  - c. General management of construction activity including noise, lighting, site footprint and water quality.
  - d. Works to enable safe kayak passage and other measures as agreed between the Applicant and WWNZ.
  - e. Potential track improvements for kayak portage.
  - f. Relocation of the Morgan Gorge swingbridge to limit visibility of weir infrastructure.
  - g. Track and recreation asset development fund.
44. Mitigation measures proposed by Mr Greenaway e to g were not adopted by the applicant.
45. Potential track improvements for kayak portage do not feature in the agreement between Westpower and WWNZ. Track improvements could assist with the ease of kayak portage, but the importance of this to kayak users of the area is unknown. Track improvements would not be inconsistent with backcountry-remote setting in my view. The CMS notes that there is an extensive network of backcountry facilities (such as roads, routes, tracks etc.) already present in the backcountry-remote zone.<sup>9</sup>
46. While I support the proposed relocation of the Morgan Gorge swing bridge to limit visibility of weir infrastructure, that measure in itself will diminish the recreational experience, which Mr Greenaway describes as "key element" of Kiwi Flat which in turn is "a core element of the recreational experience in the lower section of the Upper Waitaha Valley" due to the "visual and aural experience at and near the swingbridge". (3.17 p 17)

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<sup>9</sup> CMS Part 3 – Management Objectives and Policies p122.

47. The mitigation measures proposed by Mr Greenaway seek to address the direct visual effects of the scheme construction and operation but cannot fully mitigate the permanent change to the recreation setting and experience that will occur in the short and long term. It is unclear if potentially affected users were consulted in the development of these proposed mitigation measures including the nature and detail of any asset development fund proposed by Mr Greenaway.
48. The Applicant has stated that they are not supportive of making financial contributions to walking track and recreation asset development as further access development would conflict with the back-country remote setting. I do not agree with the Applicant that further access development conflicts with the backcountry-remote setting as tracks and bridges are a normal part of the backcountry remote setting. Development, such as rerouting of tracks, is a normal and continual activity, to respond to changes in the environment (such as slips) and if facilities are not maintained, they will eventually be lost.
49. Given the life of the Project, and the largely permanent change to recreational setting, the one-off payment of \$25,000 proposed by the Applicant appears minimal. I support some level of financial contribution to assist with the mitigation of those effects that cannot be addressed such as the change to backcountry-remote setting. The nature and level of that is best determined with the user groups and administrators of the recreational setting and should be aimed at maintaining the values of the setting (e.g. maintaining public access and facility maintenance).

## SUMMARY

50. I agree with the conclusions reached by Mr Greenaway that states “Low recreational use is a natural and preferred quality of the backcountry-remote management of the setting and not a reflection of low value. The primary recreational values of the area are its high-quality whitewater and backcountry-remote characteristics. For both values, the Waitaha contributes to a large West Coast backcountry-remote recreation setting.” (5.1 p24)
51. I agree with Mr Greenaway’s conclusion that the “scheme has the potential to affect the quality and nature of the recreation experience in the Waitaha Study Area” through changes to the backcountry-remote characteristics of the area, altered flow regimes and introduction of infrastructure both below and above Kiwi flat. This includes the introduction of flow monitoring infrastructure at Scamper Torrent and Moonbeam Hut, the effects of which, were not in my view adequately considered in Mr Greenaway’s assessment.
52. I broadly agree with Mr Greenaway’s conclusion that “For the rest of the Upper Waitaha Valley, the effect on the values will be low – moderate (and nil for those who solely traverse the top of the catchment).” (5.6 p.24)
53. I agree with Mr Greenaway’s assessment that “Within the abstraction reach and at Kiwi Flat, the change to the backcountry-remote characteristics of the setting (the recreation values) due to the placement of structures will be high after mitigation (as it imposes a fundamental change) – more so at Morgan Gorge and Kiwi Flat where the weir structures are visible and visitors have the potential to be affected by maintenance activities.” (5.6 p.24)

54. The mitigation measures proposed are focused on reducing the potential for interaction by recreationists with scheme infrastructure by realignment of access routes. While these measures will reduce the effects of the scheme, they will also reduce the quality of the recreational experience as described by Mr Greenaway... "Kiwi Flat is a core feature of the recreational experience in the lower section of the Upper Waitaha Valley. The entrance to Morgan Gorge is a key element of that, with the swing bridge passing directly over the site of the proposed weir, and the access track to Kiwi Flat Hut passing via the broad riverbed immediately adjacent. The introduction of the weir structure at Morgan Gorge, along with the lowered flow and periodic maintenance, will change the visual and aural experience at and near the swing bridge, and at the entrance to the Gorge as experienced from the river flats." (3.17 p17)
55. Wider engagement with other user groups on potential mitigation measures may yield more beneficial mitigations for recreational users.

## EVALUATION

56. Mr Greenaway's Assessment of Environmental Effects Recreation is a comprehensive assessment of the likely effects of the Project on recreation on and about the Waitaha River. It is based on a similar assessment undertaken by the same author in 2014 and supplemented by additional interviews with local landowners and helicopter operators to review any changes in access patterns up to 2024.
57. The assessment of recreational use relies largely on hut book entries, interviews, and historic data. While these are valuable, there is no evidence of recent (post-2020) systematic user surveys or intercept surveys that may identify new users of the area. This includes limited evidence for use by non-hut-based activities (e.g., day visitors).
58. While no definitive sources of information on actual use by the various recreational users is presented, the analysis of the available data (and the scarcity of data) supports the assessment that use by all user groups is relatively low.
59. The Assessment of Effects has considered the effects of the construction and operation of the Project on the wide range of current recreational users of the area and has considered the significance of those effects, regardless of levels of use, through a structured activity by activity assessment primarily using the author's professional judgment and expertise.
60. As noted by Mr Greenaway, there is no nationally accepted methodology for determining the significance of recreational values in New Zealand and Mr Greenaway acknowledges the somewhat subjective nature of significance assessment. (F.23 p80).
61. The discrepancies between Mr Greenaway's written assessment of effects (Appendix F) where he has applied a clearly defined five-point scale and Table 1 (Paragraph 4.1) where he appears to have summarised the findings of his assessment using a seven-point scale as described in paragraph 3.3 requires clarification.
62. I conclude that Mr Greenaway has clearly defined the study area and recreation values including use, setting, experience and substitutability, used the available historic data sources updated to 2024, has provided clear criteria when assessing effects.

## S51 FTAA COVERING REPORT – DEPARTMENT OF CONSERVATION

63. I agree with DOC's assessment in 5.1.4 (p9) that there will be "a permanent loss of naturalness that is central to the back-country remote recreational experience".
64. Mr Greenway states "The DOC assessment concludes 'high' residual effects on "Loss of Naturalness" for kayakers in the "upper Waitaha Gorge and Kiwi Flat reach" (p6), and I find the same level of effect on recreational values for all visitors within the "abstraction reach, Morgan Gorge and Kiwi Flat" <sup>10</sup> DOC and Mr Greenaway are therefore in agreement on the "loss of naturalness".
65. DOC and Mr Greenaway differ on their assessments for recreation opportunities for kayakers and effects on recreation values in the catchment above Kiwi Flat. I discuss this in paragraphs 75-78 below and agree with Mr Greenaway's assessment of effects or recreation opportunities for kayakers and effects on recreation values in the catchment above Kiwi Flat.
66. DOC believes that the one-off contribution toward hut and track maintenance proposed by Westpower is inadequate and has instead proposed a "compensation value based on the loss of recreational opportunities to trampers over a 20-year period".
67. "Appendix 2 Calculation of loss of recreation value" of Appendix C2 Recreation Technical Report DOC states that the methodology is based on "the Net Present Value of the value of the huts and tracks to hikers over a 20-year period." with "the value of the use of the tracks estimated using the Time Valuation Method (revealed preference) using the time hikers spend hiking on the tracks."
68. Mr Greenaway and Mr Copeland both comment on the DOC methodology to arrive at the value of lost recreation value. Mr Greenaway discusses the Travel Cost Method of valuation and its limitations. Mr Copeland states that the DOC methodology is arbitrary.
69. While I am familiar with two recent studies to estimate the economic value of parks and conservation lands in New Zealand which utilise net present value<sup>11</sup>, I am not aware of the application of the methods used by Ms Sidley as an accepted and reliable method to calculate the loss of recreation value at a particular location with the limited data available and therefore support the view that the Time Valuation Method calculation in DOC's Recreation Report should be disregarded.

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<sup>10</sup> Memorandum #7: Attachment 10 Statement of Rob Greenaway, 21 January 2026 (paragraph 7. P2)

<sup>11</sup> NZIER. (2024). *The value of public conservation land. A report to the Department of Conservation and Dalziel, Paul, Stephen Espiner, John Saunders and Paul Rutherford (2024). The Economic Value of Parks: A Framework and Preliminary Estimate.*

70. I note that neither Mr Greenaway's proposed compensation nor DOC's proposed compensation includes consultation with users or consideration of how compensation may be applied to mitigate effects in the Waitaha Valley whilst maintaining the backcountry-remote setting.

## Appendix C2 Recreation Technical Report - DOC

71. Ms Sidley has presented a Recreation Effects Summary which applies the same five-point effect scale used by Mr Greenaway but focuses on evaluating effects on visitor groups and visitor experience outcomes rather than assessing effects primarily at regional and local scales for specific recreation activities.
72. Ms Sidley notes some inconsistencies in Mr Greenaway's assessment of construction effects and assesses construction effects as "significant" whereas Mr Greenaway states the construction effects on recreation values will be "significant" (F.57 p85) or "Very High" (Table 1:4.1). I agree with Ms Sidley that construction effects on recreation will be significant using the five-point effect scale.
73. Appendix 1 of Ms Sidley's report provides a summary of the key areas of agreement and disagreement with Mr Greenaway's assessment along with recommended amendments to mitigation and compensation measures (the latter which I have discussed above).
74. Ms Sidley's summary of recreation use and facilities (25. P 10) is generally consistent with Mr Greenaway's Appendix F effects analysis and there is agreement that while the general recreational use of the area is low, low use does not equate to low value which, as noted, I also agree with.
75. I agree with Ms Sidley's assessment that effects (32 p.12) above Morgan Gorge would not merely be perceptual. In this regard I disagree with Mr Greenaway who assesses the effect on "All activities – opportunity- Upper Waitaha Valley" as "Nil (opportunity unaffected" but the effect on values in the managed backcountry remote experience (above Kiwi Flat) as" Low to moderate (transient for those who walk up the whole Upper Valley, perceptual effects (from knowing the river tamed)." (Table 1 p22). In my view the proximity and visibility of weather monitoring infrastructure to recreation users, along with the frequency of activity to maintain and service the infrastructure, will determine the significance of those effects on recreation users above Morgan Gorge. I consider the level of effect in the Upper Waitaha Valley (above Kiwi Flat) to be low when no maintenance activity is occurring and moderate when maintenance operations are taking place.
76. Ms Sidley assesses the effects in the Upper Waitaha Valley will be moderate while Mr Greenaway states that they will be low to moderate and "nil for those that solely traverse the top of the catchment). Ms Sidley states that "she does not agree with the Greenaway assessment that effects on recreation values above Kiwi Flat are minimal. All visitors must pass through the construction zone, experiencing direct noise, machinery, and visual intrusion. These effects extend well into the upper valley, where frequent helicopter operations and the presence of monitoring stations at Scamper Torrent and Moonbeam Hut further erode naturalness and solitude for trampers, hunters, and canyoning groups." (64. P 10) I note that it is not correct to state that all visitors *must* pass through the construction zone, as it is possible to traverse the top of the catchment without doing so.

77. Mr Greenway has also commented in his statement of 21 January 2026 that a weather station is currently installed at Ivory Lake and that he considers them “very normal elements of a tramping experience”. I do not agree that coming across weather stations in remote settings would be considered “normal”. While NIWA does have an extensive network of environmental monitoring stations<sup>12</sup> and some are in very remote settings, I would describe encountering a weather station in a very remote setting as unusual. I would consider the effect of the presence of weather stations in remote locations on recreation values as low.
78. I favour Mr Greenaway’s assessment of effects in the Upper Waitaha Valley, as using the scale of effects adopted by both Mr Greenaway and Ms Sidley, low refers to small changes in the setting but the activity continues and users may be unaware of the change and moderate refers to changes in the setting but the activity can continue retaining most or many of its original values. I agree with Ms Sidley’s contention that the effects in the upper catchment are greater than perceptual only. Nonetheless the effects will be low to moderate in my opinion.
79. Ms Sidley assesses the effect on kayaking as high and states Mr Greenaway assesses it as low to moderate. Mr Greenaway states the “effect of the Scheme on each individual section of the river ranges from 'low' above Morgan Gorge to 'high' between the top of Morgan Gorge and the Douglas Creek confluence” (F38, p82) and “This is a major change from a completely uncontrolled river setting and the net effect on kayaking on the entire River would be 'high'.” (F39, p82). Mr Greenaway also states that “For those who kayak the Morgan Gorge the Scheme has the potential (without mitigation) for a very high level of adverse effects on recreation opportunities.” (3.9 p 16). Mr Greenaway only assesses the effect on kayaking as low to moderate for the section above Morgan Gorge. (3.12 p17). I support Mr Greenaway’s assessment that effects on the Kayaking opportunity are very high in the Morgan Gorge and Douglas Creek abstraction reach and low to moderate upstream of Morgan Gorge.
80. Ms Sidley assesses the effect on downstream activities as low to moderate whereas Mr Greenaway assesses it as nil for angling and jet boating. Based on Mr Greenaway’s assessment that there is little (but some) jetboating or angling between the bottom of Morgan Gorge and the Scheme tailrace, I would support Ms Sidley’s assessment that the effects are low to moderate as the users are likely to be aware of the changed recreational setting in the vicinity of the tailrace and related infrastructure. The effect on recreation values will be low if infrastructure cannot be seen by river users and moderate if infrastructure is visible. I would consider this a minor effect on jetboating and angling.
81. Ms Sidley disagrees with Mr Greenaway’s assessment that the effect of the transmission line (from Macgregor Creek to the Power Station) will be low to moderate (assuming rerouting of the current track alignment). I support Mr Greenaway’s assessment assuming rerouting occurs to minimise opportunities to view transmission lines.

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<sup>12</sup> <https://niwa.co.nz/environmental-information/niwa-monitoring-stations>

82. I agree with Ms Sidley that the presence and operation of the excavator at Kiwi Flat to undertake river works will be high to moderate when in operation. The effects when operating will primarily be noise related along with the incompatibility of the activity with the backcountry remote setting. Painting the excavator in a recessive colour would not mitigate these effects. When not in operation, the excavator will not be visible as it will be stored in the tunnel, and the effect will therefore be low for most of the time.
83. Ms Sidley proposes the reinstatement and maintenance of the original track on the true left of the Waitaha River to reduce the effects of the proposal by routing track users away from most of the power station infrastructure. Mr Greenaway also notes that transferring access to the true left of Morgan Gorge would give "better access to the hot springs and views into the Gorge, and reducing interaction with the Scheme Headworks at Kiwi Flat.
84. Relocation of the track to the true left would require a significant bridge to be constructed over the Waitaha River at the Alpha Burn. While I acknowledge this is not part of the Project, I would support further investigation of this proposal, including consultation with users, to enhance access and address the impacts of the Project.

## COMMENTS UNDER THE FAST-TRACK APPROVALS ACT 2024

85. I have reviewed the comments received by the New Zealand Conservation Authority, the West Coast *Tai Poutini* Conservation Board and DOC as they relate to recreation.

### New Zealand Conservation Authority

86. I generally support the comments of the NZCA on page 8 regarding the recreational setting and loss of naturalness. However, I disagree that the effects of the scheme are high for the entire setting. I consider the effects on the Upper Waitaha Valley are low to moderate as low refers to small changes in the setting, but the activity continues and users may be unaware of the change and moderate refers to changes in the setting, but the activity can continue retaining most or many of its original values. Neither suggests all values are fully retained.

87. The NZCA comments also include advice from Federated Mountain Clubs Incorporated (FMC). I do not agree with FMC that a multiplying factor of 3-4 should be applied to the hut book records reviewed by Mr Greenaway. Hut book records can only be used to reliably estimate use if they are calibrated with actual observations of use at the hut in question and applying a standard multiplying figure ignores the variability in hut book entries that is likely to exist between huts where individual motivations for completing hut book entries may vary widely. Mr Greenaway in his response of 21 January 2026 discusses some of these motivations which I agree with. As noted by Cessford & Burns (2008)<sup>13</sup>, hut book data should only be treated as "indicative". I believe Mr Greenaway has been conservative in his estimates of use, and his analysis should not be considered a "factual error".

### West Coast *Tai Poutini* Conservation Board

88. As discussed above (Paragraph 49), I agree with the Conservation Board that the "one-off" compensation for track and hut maintenance is inadequate and does not reflect the loss of long-term recreational opportunities."
89. In my opinion the appropriate level of compensation for effects that cannot be mitigated will be in part determined by the level of effort made to reduce the effects of the scheme such as alternative track alignments and access improvements and other measures incorporated into the conditions of consent.

### Department of Conservation

90. I generally support the comments made by DOC as they relate to recreation however I disagree that effects on kayaking above Morgan Gorge are High. I support Mr Greenaway's assessment that they are Low to Moderate above Morgan Gorge (F.25) and High (F.39) when considering the net effect on the entire river.
91. I disagree with DOC's assessment that the effects on recreation values above Kiwi Flat are moderate as discussed in paragraph 76-78 above.
92. I disagree with the method used to assess the value of compensation used by DOC as discussed in paragraphs 66 – 70. Should any compensation be payable, I would suggest that the Panel, if possible, seek to ensure that any compensation whether paid to DOC or any other entity is tagged to improvement or maintenance within the Waitaha Valley where the effects occur.

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<sup>13</sup> Monitoring visitor numbers in New Zealand national parks and protected areas A literature review and development summary Gordon Cessford and Rob Burns. p.16

## **FTAA - WAITAHA HYDRO PROJECT: PROFFERED CONDITIONS FOR RESOURCE CONSENTS**

93. I do not have comment to make on the proffered conditions for resource consent.

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