

APPENDIX G: SUMMARY OF COMMENTS ON APPLICATION | ĀPITIHINGA G: WHAKARĀPOPOTOTANGA O NGĀ TĀKUPU MŌ TE PUKA TONO

No.	Person	Comments on Application
1	Neil Donnell	Local resident who fully supports the application.
2	Minister for Rural Communities	Strongly supportive of application as will generate significant amount of renewable energy, create approximately 70 jobs during construction, help lower wholesale power prices, reduce carbon emissions, and build resilience in an isolated region reliant on important electricity.
3	Minister for RMA Reform & Infrastructure	Broad support for projects like Waitaha that will deliver positive outcomes for New Zealand; while noting it represents a relatively small amount of additional renewable energy generation. Project consistent with the NPS-REG and NPS-EN and will assist with meeting the target of doubling renewable energy generation. Ongoing monitoring and adaptive management will be necessary to ensure compliance with the NPS-FM and NES-FM.
4	Te Minita Whanaketanga Māori (Māori Development) me Te Arawhiti (Crown Relations)	<p>Support the application as: it has the ability for Papatipu Rūnanga to become project partners and hold a financial interest in the development, will provide much needed electricity to support the national grid, and the use of renewable energy is consistent with the Government’s climate goals.</p> <p>Encourage consideration be given to comments provided by relevant Māori groups, the association of Ngāi Tahu with taonga species within the project area, and the provisions of the relevant Mana Whakahono ā Rohe. Also encourage the Applicant to engage with Ngāi Tahu on how best to manage the construction and maintenance activities on pounamu.</p>
5	Minister for the South Island and Hunting and Fishing	<p>Project’s contribution to energy infrastructure aligns with national and regional priorities for renewable energy generation and energy security.</p> <p>Conditions should ensure reasonable public access during and after construction where practicable. Upgrading of tracks and public facilities should be encouraged. Measures could be implemented to</p>

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		minimise disruption to species important for recreational hunting and fishing and to monitor ecological impacts on freshwater species.
6	Minister for Regional Development	Based on the analysis provided in the application, the West Coast region would experience important economic benefits throughout the Project’s construction period. There would also be increased energy resilience. Economic impact on visitation numbers is likely to be low given usual visitation numbers are not significant. The proposed Scheme output is modest.
7 and 7a	Minister for Energy	<p>Consider the Project will have significant regional benefits through:</p> <ul style="list-style-type: none"> • Significant contribution to electricity support for West Coast – enough to power 12,000 homes or approximately half of the West Coast’s average annual electricity needs. • Contributing to climate change targets (through reducing use of thermal fuels and support increased demand for electricity for sectors such as transport), security of energy supply (through increased generation and geographic diversity of energy generation closer to energy users), downward pressure on wholesale electricity prices (supporting more affordable energy). <p>Project will also likely have significant national and regional benefits in terms of climate adaptation, and material does not indicate significant adaptation risks.</p>
8 and 8a	WCRC	<p>Regular and constructive engagement has occurred with the Applicant allowing for feedback on draft reports, high level feedback on flow modelling (noting WCRC did not have in-house expertise to undertake a full peer review) and to provide input into draft conditions.</p> <p>WCRC has no objection to DOC have a joint certification role.</p> <p>WCRC has no significant outstanding concerns with the Application aside from the enforceability of conditions relating to payments or compensation to third parties.</p>

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		WCRC would welcome the opportunity to provide further input on conditions as the process progresses.
9	Mclean Company Ltd (George & Marianne McLean)	<p>Support the Project as it is a renewable green source of power and the Scheme will:</p> <ul style="list-style-type: none"> • Provide a large reduction in transmission loss from the east to west coast, will be great for power resilience in the region, may lead to cheaper power, and will provide job opportunities during construction. • Have only short-lived adverse effects on their business and no long-term damage to their infrastructure but will have long-term benefits in terms of development of some of their rough paddocks.
10	Poutini Ngāi Tahu	<p>Support Project and partnership approach which reflects their tino rangatiratanga, the principles of the Treaty of Waitangi, the Ngāi Tahu Climate Change strategy.</p> <p>Project will be of significant benefit to Poutini Ngāi Tahu via reconnecting with whenua and economic benefits. Project will also benefit wider West Coast community through electricity resilience, security of supply, reduced transmission charges, comparatively cheaper power and line charges, and through providing employment and training opportunities, and investment for the region.</p> <p>Project is consistent with Ngāi Tahu Treaty Settlement and Mana Whakahono-ā-Rohe with WCRC.</p> <p>The Waitaha Valley makes up a small proportion of the back-country remote area on the West Coast, and the landscape and recreation matters have been addressed to their satisfaction. So too have the cultural and environmental effects including on wildlife and taonga species.</p> <p>In terms of Conservation Act matters:</p>

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		<ul style="list-style-type: none"> • The proposed short- and long-term concessions are separate and do not trigger the right of first refusal. • The CMS was not co-authored with mana whenua and because of recent stewardship land reclassification process, Waitaha remains stewardship land (not a stronger conservation status). <p>Poutini Ngāi Tahu supports ongoing discussions outside of the Fast track process around improving access to the Waitaha valley.</p>
11	West Coast Tai Poutini Conservation Board	<p>Has been consulted by Westpower and is satisfied consultation has taken place with Poutini Ngāi Tahu, NGOs, interested parties, landowners, and local councils.</p> <p>Land remains stewardship land following stewardship land review.</p> <p>Board supports increasing resilience of electricity supply for West Coast.</p> <p>In terms of compensation the Board considers it needs to be embedded within the operational activity and not considered within the resource consent process. The one-off compensation for track and hut maintenance is inadequate – they instead support DOC’s alternative proposal.</p> <p>The Board considers DOC must be involved in all stages including certification.</p> <p>Modelled vegetation clearance maps would assist with understanding vegetation loss.</p> <p>Supports monitoring/mitigation for bats but need to add reporting on bat harm/deaths. Also needed for avifauna and not mentioned for terrestrial fauna.</p> <p>Supports recommendations in terrestrial fauna, terrestrial invertebrate, lizards who and freshwater reports – but notes board would support use of DNA in providing info about relocated lizard populations, feasibility of relocating who was not considered, and if eDNA is used limitations</p>

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		<p>on technique should be stated. Noted impacts on terrestrial invertebrates would be less than minor. Considers VMP, AMP, BMP, LizMP and FEMP to be appropriate.</p>
12 and 12a	Westland District Council Te Kāhui o Poutini	<p>WDC agrees with reasons for consent and the Applicant’s assessment against the relevant statutory framework including the TTPP.</p> <p>WDC visited the Site, reviewed draft versions of reports and conditions, and provided feedback prior to lodgement. Has no outstanding matters to raise other than the following conditions of consent:</p> <p>Part B – Conditions Common to WCRC and WDC</p> <ul style="list-style-type: none"> • Deemed certification condition for management plan (Condition 9) - courts generally not accepted such an approach. • Kayaking and no-take days (Conditions 27-30) - obligations to third parties may sit outside matters WDC can monitor and enforce. • Flow data available to public (Condition 31) - not relevant to District Council functions. • Public access and safety (Conditions 32-34) - may sit outside matters WDC able to monitor or enforce. <p>Part D – Specific Conditions</p> <ul style="list-style-type: none"> • Recreation compensation – may sit outside matters WDC able to monitor or enforce.
13	Minister for the Environment	<p>Section 6 of the RMA and national direction, particularly NPS-IB are relevant.</p> <p>Panel should consider following changes to conditions to improve outcomes for significant fauna impacted by Project:</p>

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		<ul style="list-style-type: none"> • Amending AMP condition to require avoidance of helicopter movements during the breeding season. • Amending LizMP to include post-release monitoring. • Amending BMP to address impacts of artificial lighting during construction and operation as much as possible.
14	Tāwhiri-Mātea Ltd	<p>First became aware of Project in November 2025 – when purchased property in 2023 understood Project had been rejected. Difficulties accessing info.</p> <p>Landowner but do not live in district so unaware of public hui – should have been directly invited not rely on public Facebook notices. Email address reasonably discoverable and should be used for all future correspondence. Want a Westpower contact if questions arise and for future engagement. Timing of request for comments unreasonable.</p> <p>In relation to gravel extraction:</p> <ul style="list-style-type: none"> • Have interest in gravel Westpower is going to extract as have right under district plan to extract gravel as permitted activity for a formed track for their adjoining property. • Location 6 of Westpower’s proposed gravel extraction appears to be on their land. • Gravel screening area directly opposite their northern boundary. Unable to locate info about operating hours, dust, noise, and light pollution. <p>In relation to transmission lines want to be consulted if run down Allen Road.</p> <p>In relation to construction – the timeframes are uncertain – 2 to 4 years, up to 10 years, and 15-year consent sought. Request to be kept informed.</p>

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		<p>In relation to the environment – consider Forest and Bird’s comments on Westpower 2016 application still relevant, hope to see significant investment in valley in terms of flora and fauna pest control, concerns about pests being pushed onto their land from riverbed and up the valley, consider valley is natural and that is what brings people into valley, and project will be industrial intrusion into an otherwise natural environment.</p> <p>No benefit to them of project and will lose peaceful enjoyment during construction.</p>
15	Granite Developments Ltd (Susan and Mervyn George)	<p>Believe hydro once up and running will be of benefit with little visual impact.</p> <p>Concerned re lack of consultation with them on South Bank of Waitaha River until received 26 November letter. They will be directly opposite proposed workshop, office, and amenities block. Want to be kept informed.</p> <p>See potential for disruption to “sleepy valley” through helicopter noise, machinery, and night lighting. Westland Schist existing operation echoes through the valley. Concerned re potential for pest pigs to be driven onto South Bank properties, and for deer to stay away from South Bank affecting their hunting.</p>
16	DOC	<p>DOC considers that there are number of additional measures that Westpower can take to further avoid, remedy, mitigate or compensate adverse effects on recreational, ecological, landscape and natural character values. These include:</p> <p><i>Recreation</i></p> <ul style="list-style-type: none"> • Reinstating the original track to Kiwi Flat on the true left of the river for the life of the Project; • Burying the transmission lines for at least 200m from the Power Station and no transmission tower to be erected at the switchyard;

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		<ul style="list-style-type: none"> • Amend the conditions to remove the opt-out so that a minimum of four no-take days is provided every year; • Increase compensation for recreation to \$16,000 per annum or \$315,000 one-off payment and pay to DOC. <p><i>Natural character and landscape</i></p> <ul style="list-style-type: none"> • Make the permanent access road narrower than 12m where practicable; • Requiring use of appropriate colour palette for structures; • Undergrounding transmission cables where practicable; • Vegetation screening of building, machinery and activities and use of species list in LMP; • Compensation to address conservation values. <p><i>Ecology</i></p> <ul style="list-style-type: none"> • Electrocutation risks to Kārearea and potential presence of kiwi pukupuku should also be considered; • AMP should clarify the nesting deterrent methods proposed and their effectiveness; • A requirement for construction to pause if who are injured or killed until a review is undertaken and mitigation measures implemented; • Change the BMP to ensure the proposal is consistent with Bat Roost Protocols;

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		<ul style="list-style-type: none"> • Minimise the width of the permanent access road and move transmission cables underground where possible; • Amend the LizMP to provide information on transport options and distant to nearest wildlife vet, triggers for continuing salvage until captures decline, require predator management or predator proof rock refuges at lizard release sites, include a detailed contingency plan if West Coast green gecko are found or a stop works condition, restricting of habitat clearance outside the approved lizard management season in areas where pre-salvage has occurred during the immediately preceding March/April and no lizards were found. <p>DOC also seeks that it approve/certify management plans relevant to its responsibilities.</p> <p>Overall, DOC considers that the residual effects on recreational opportunities and values remain significant, and that despite Westpower’s efforts to address adverse landscape effects, not all effects can be mitigated, and the Scheme inherently detracts from the very high natural character and landscape values.</p> <p>The Waitaha Valley is recognised as a regionally significant backcountry setting, offering a distinctive combination of accessible remoteness, challenging terrain, and unique features such as Morgan Gorge. The Waitaha is also part of a much larger network of backcountry opportunities across the West Coast, which collectively provides a wide range of tramping, hunting, and advanced internationally significant kayaking experiences.</p> <p>The Scheme’s contribution to New Zealand’s renewable energy strategy is a relevant positive effect. However, the overall contribution of the Scheme (23MW) is small and regional in scale and is a small fraction of the 926 MW of increased generation that New Zealand will require by 2030 to meet increasing demand. These benefits must be weighed against the adverse effects of the activity on very high natural character and landscape values, on the regionally significant backcountry setting, and on internationally significant kayaking experiences.</p> <p>The proposed conditions do not currently adequately avoid, remedy, mitigate, offset, or compensate for the loss of values, and the Project will result in the fundamental loss of natural</p>

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		<p>character, solitude and remoteness that underpin the Waitaha Valley characteristics of a back country-remote zone.</p> <p>DOC provided a further set of marked up conditions intended to better address effects (Appendix A) and a list of DOC questions on landscape and design issues together with Westpower’s responses.</p>
17 and 17a	New Zealand Conservation Authority	<p>NZCA acknowledges the significance of infrastructure development but stresses that such development must not compromise Aotearoa’s conservation duties or the Crown’s responsibilities under the Treaty.</p> <p>NZCA does not support Westpower’s view that the CGP and CMS should be considered “in the round” or “holistically”. They consider that if the Project is inconsistent with some key provisions, it is inconsistent with the CGP.</p> <p>NZCA agrees with DOC that the Scheme is not consistent with the CGP as it is inconsistent with several key policies including Policy 4.5(b) relating to geological features, landforms and landscapes, Policy 11.1 relating to effects of activities, and Policy 11.3 relating to utilities.</p> <p>NZCA agrees with DOC that the Scheme is not consistent with the CMS as it is inconsistent with several key provisions because of its adverse recreation and landscape effects. In particular: Section 3.3.4.3, Objective 1 and Policy 1 (relating to natural character and landscape); Section 3.5 and Objective 3 (relating to recreation particularly kayaking); Section 3.6.1.1, Objectives 1 – 3 (due to impacts that introduction of infrastructure and mechanisation would have on recreational experience); Section 3.6.1.4, Objectives 1-2 and Policy 1 (due to reduction in backcountry remove character as a result of infrastructure and change in natural river flow); Section 3.7.2 and Policy 1(a) and (e) (due to impacts on high natural character and landscape values); Section 4.1.1 (due to impacts on recreation back country experience through introduction infrastructure and controls on river).</p>

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		<p>NZCA agrees that with Poutini Ngāi Tahu being a project partner, Treaty considerations have been met.</p> <p>NZCA categorically opposes Westpower’s view on the scale of recreation and landscape effects. While Waitaha is part of a much larger network of backcountry opportunities, its characteristics make it special and highly valued component.</p> <p>Low recreational use reflects the backcountry remote management intent and is not a measure of low value. The introduction of artificial structures and activity and the controlling of a formally wild river would be a fundamental change to character and setting – particularly during construction but continuing during operation. Recreation will be severely compromised from the loss of naturalness/remote back-country setting, and no recreational gains have been identified. Effects will continue and remain high so long as the Scheme is in place.</p> <p>In terms of recreation, NZCA also draws the panel’s attention to a number of factual inaccuracies in the Applicant’s recreation report relating to foot access, potential movement of the track/swing bridge, scale of effects on kayaking community, fails to meaningfully address other recreational users, financial support for hut and track maintenance groups, reliance on visitor number statistics and hut book entries, a failure to recognise world class quality of canyoning, and inaccuracy describing a 2014 peer review as relating to the current recreation report.</p> <p>NZCA notes DOCs assessment in terms of vegetation and avifauna and agrees with DOC in not supporting a proposal to fell low-risk trees without reference to the bat protocol.</p> <p>In terms of the concessions, NZCA notes Westpower has not provided evidence for why a 49-year term specifically is required, and that the effects on natural character and landscape cannot be fully avoided, mitigated, offset, or compensated for.</p> <p>In terms of the Wildlife approvals, NZCA is satisfied that the systems agreed with DOC will satisfactorily mitigate any adverse impacts.</p>

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		Due to inconsistencies with the CGP and the CMS, NZCA strongly believes the Project should not proceed. However, if the Panel decides to grant the approvals, they request enforceable conditions be included to uphold the principles of the CGP and CMS.
18	Bryan Chinn	No substantive comments included with comment form.