

Otago Regional Council
DIRECTIONS OF THE COMMISSIONER
BSTGT Limited

Questions for the applicants witnesses

- [1] I have now read the applicant's evidence statements. I have several questions for some of the authors. I would appreciate it if the respective authors could provide written answers to the attached questions at their earliest convenience and prior to the commencement of the hearing.
- [2] If any of the authors consider that a question addressed to them is best answered by another of the authors then I am happy for that to occur.
- [3] I would prefer that all of the answers are provided in one document underneath the relevant questions.
- [4] The document with the answers must be provided to the ORC Hearing Secretary, Rochelle Stevenson, in **Microsoft WORD** format. The document must be 'unlocked' so that it can be annotated by the Commissioner.

Pictures and videos supplied

- [5] Mr McQuilkin's evidence included 482 MB of videos and pictures in 17 files. I found it difficult to view that material or to understand why it had been provided. The only direct reference to that material (as far as I can recall) by the applicant's expert witnesses was at paragraph 95 of the evidence of Hilary Lennox where she referred to "photos and videos taken by Mr McQuilkin on 25 February, 28 February and 3 March."
- [6] Submitters have expressed similar concerns.
- [7] I request the applicant to provide a further concise document (at their earliest convenience) containing only photographs (not videos) that clearly identifies the relevance of the photographs, the locations in the Royal Burn (or new Chums Creek) where they were taken and the expert evidence that they are intended to support.
- [8] The further document should be provided to the ORC Hearing Secretary, Rochelle Stevenson, in **Microsoft WORD** format. The document must be 'unlocked' so that it can be annotated by the Commissioner.
- [9] Hard copies of the further document should be made available by the applicant at the hearing.



Rob van Voorthuysen
Commissioner
2 June 2021

QUESTIONS FOR BSTGT et al WITNESSES

Tony McQuilkin

No questions.

Matt Hickey

Para 43(b) Can you please outline the basis for your opinion that “5 l/s will provide adequate habitat for the freshwater ecological values present in that perennial gaining reach”.

Dean Olsen

No questions

David Howard

No questions

Hilary Lennox

For the lower RBNB Ms Miller recommended a “50:50 flow sharing” regime because on her site visit she observed that the flow at that intake was spilt by a large rock at and 50% of the flow was abstracted and 50% carried on downstream.

- Does the applicant have a view on that particular recommendation?

Para 101 You say that “I note that there is no take of water for domestic use proposed as part of this application ...”

- Can you explain what you mean by that since I understand the BSTGT application¹ to replace its deemed permits includes the use of water for domestic purposes?

Para 109 I assume that the 38,989 m³/yr does not the K-line irrigation for the turf growing operation because at para 112 you say that is included in the 139.2 ha of irrigable land.

- Is that correct?

Para 116 I am aware that the Environment Canterbury Land and Water Regional Plan (Schedule 10) assumes demand conditions that occur 9 out of 10 years (equivalent to a 90-percentile demand). Similarly, the Southland Water and Land Plan (Appendix O) stipulates use of a field-validated daily time-step irrigation demand model to calculate the annual irrigation volume for 90 percent (9 in 10 year) reliability. Other regional councils that I am familiar with also allocate irrigation water for a 9 in 10 years security of supply including Hawke’s Bay,² Waikato³ and Northland.⁴

- Can you direct me to any regional plan in the country that includes a policy (or rule) provision that provides for irrigation water to be allocated for a 100 percentile demand (namely a 10 in 10 year reliability of supply).

Para 122 I assume that stock drinking water is required each day of the year and so water will flow through the race system each day of the year.

- Can you further explain why a baseflow allocation is required over and above the 19.25 m³/day of stock drinking water that is now sought?

¹ See for example Table 4 of the AEE.

² Regional Resource Management Plan, Policy 32 for groundwater. For surface water the security of supply is 1 in 5 years (Policy 42).

³ Waikato Regional Plan, section 3.4.3 Policy 2.

⁴ Northland Regional Plan, section D.4.13.