

In the matter of:

The Resource Management Act 1991

And

In the matter of:

CRC011989 Padkins Creek Community Race

SUPPLEMENTARY BRIEF OF EVIDENCE

KERI JOY JOHNSTON

Dated: 22 September 2008

Comments on the evidence of submitters

1. In paragraph 32.32 of Mr. Potts evidence, he is unable to match my calculations for this applicant.
2. In paragraph 43 of my evidence, the figure of 534,515 cubic metres per year is actually the figure for litres per day. This equates to an annual volume for stockwater of 203, 128 cubic metres per year.
3. Ms Pringle of Fish and Game in paragraphs 124 to 132 of her Brief of Evidence raises several points in relation to this application. These are addressed as follows:
 - 3.1 This is a full renewal of the water rights listed in paragraph 9 of the S42a report for this application, which currently authorize a diversion of 110L/s from Kirkliston Stream. It is not an increase from 45L/s as suggested by Ms Pringle.
 - 3.2 The diversion is able to be controlled. In paragraph 21 of the S42a report for this application, it is correctly stated that there are two intakes. One allows a maximum of 50L/s to be diverted, and the other is adjustable to control the rate up to that required. The diversion is able to be completely shut off, however, the first intake is always slightly open to maintain a base flow into the race system and further flow into the race is received from naturally occurring water courses along its path.
 - 3.3 There is an issue in that the annual volume proposed is that which is “consumed”. The reality is that approximately 10L/s is always diverted, and this is 315, 360 cubic metres per year (in total, we are seeking 214, 808 cubic metres to be consumed), but it will be more than this as the flow increases up to 110L/s to meet demand. But it is not actually taken out of the race system. Ms Pringle suggests that annual volume is equivalent to an instantaneous rate of 0.017L/s. From the previous annual volume, it is actually 17L/s. With the revised annual volume, it is 7L/s.
 - 3.4 In paragraph 41 of the S42a report for this application, it is correctly noted that there is uninterrupted fish passage throughout the system and the race augments flows in Padkins, Bellfield and Farm Streams. Therefore, Ms Pringles suggestion that fish will become entrained in the system is untrue. In actual fact, it is better to have a continuous diversion to ensure that this does not happen.
 - 3.5 The race has been in existence since the late 1800’s and has sealed over time. At one stage, piping had been considered, but is too expensive, and given that there are not significant losses from the system, is not necessary at this stage.

3.6 The system has also “naturalized” over time and is now shown on topographical maps. It has become part of the Hakataramea Catchments vast array of waterways, and yes, stock have had and still have direct access to it.

3.7 Star Holdings now owns many of the properties serviced by the race and as part of the mitigation package proposed by other applicants seeking to use water for irrigation (including Star Holdings), there is an undertaking to exclude stock from having direct access to waterways. This will be of benefit to the race system as well.

References requested by commissioners

4. The 2000L/household/day is considered maximum demand for rural properties (See Waimakariri DC Guidelines). The following web links provide further detail on this figure.

http://www.waimakariri.govt.nz/services/water/QS-U550-AA_Application_for_the_Supply_of_Water%20_A3_%20-%20July_2008.pdf

<http://www.mfe.govt.nz/publications/water/waitaki-potential-demands-jan05/html/page3.html>

5. In respect of the report by MfE (the above link), the Hakataramea is catchment number 13 in this analysis. The study excluded stockwater, and therefore, only assessed potable water needs.

5.1 MfE has the annual requirement for potable water supply for the catchment at 274, 742 cubic metres per year maximum and 109, 897 cubic metres probable.

5.2 There are approximately 35 properties in the catchment, and therefore using the probable maximum annual figure = 3, 140 cubic metres per property per year.

6. For 16 properties as per this application, this would equate to 50, 239 cubic metres per year. We have applied for 11, 680 cubic metres per year for potable water supply, which is much less.