

**BEFORE INDEPENDANT HEARING COMMISSIONERS
APPOINTED BY THE CANTERBURY REGIONAL COUNCIL**

UNDER: the Resource Management Act 1991

IN THE MATTER OF: Proposed Plan Change 7 to the
Canterbury Land and Water Regional
Plan – Section 14: Orari-Temuka-Opihi-
Pareora

**SUMMARY OF EVIDENCE IN CHIEF OF KERI JOY JOHNSTON ON BEHALF OF
THE OPIHI FLOW AND ALLOCATION WORKING PARTY
(SUBMITTER NO. PC7-382)**

Dated: 27 October 2020

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1. INTRODUCTION

- 1.1 My full name is Keri Joy Johnston. My experience and qualifications are set out in my primary statement dated 17 July 2020.
- 1.2 The purpose of this summary is primarily to provide an update where my earlier evidence has changed following expert caucusing and detail the remaining outstanding matters unable to be resolved through caucusing and my opinion in respect to each.

2. EXPERT CAUCUSING - HYDROLOGY

- 2.1 Based on the analysis set out in my evidence in chief, it was my opinion that the following changes were required to PC7:
- (a) The allocation limit for the North Opuha River in Table 14(m) of PC7 should be 255 L/s (not 243 L/s).
 - (b) The line for Deep Creek in Table 14(m) of PC7 is not needed and should be deleted.
 - (c) An additional table for “other streams” is required. Station Creek, which is currently in Table 14(m) should be in this new table.
 - (d) Unnamed Stream, which is recommended for inclusion in Table 14(n) for South Opuha, should also be added to the new “other streams” table with an allocation limit of 8.5 L/s and a minimum flow of 3 L/s immediately downstream of the take.
 - (e) The allocation limit for the Upper Opihi River in Tables 14(p) and (q) should be 493.46 L/s (not 474 L/s).
 - (f) The allocation limit for the Te Ana Wai River in Tables 14(r) and (s) should be 261.6 L/s not 284.11 L/s.
 - (g) In regard to partial restrictions, the AN allocation should be stacked on top of the AA/BA allocation.

- 2.2 I will address each of the points above, in light of the outcome of the hydrology caucusing, including Table 19 of the Joint Witness Statement (JWS) of the hydrology witnesses, which details the agreed allocation figures for each waterbody.
- 2.2 On the basis of the agreed allocation figures in the JWS, points (a) and (f) above were resolved and the allocation figures for the North Opuha and Te Ana Wai Rivers were agreed at 255 L/s and 261 L/s respectively and Tables 14(m) and 14(r) and 14(s) need to be amended accordingly.
- 2.3 In regard to point (b) above, it was also agreed that the allocation limit specified for Deep Creek in the plan was not needed as it is already included in the allocation limit for the North Opuha River (as it is a diversion from this river and a discharge into Deep Creek). This will result in the deletion of the line for Deep Creek from Table 14(m).
- 2.4 In regard to point (e) on the Upper Opihi, the A allocation limit is actually 520 L/s. This is due to a change in Opuha Water Limited shareholding via a lease arrangement that has occurred recently. Table 14(p) needs to be amended accordingly.
- 2.5 Points (c) and (d) have also been agreed upon from a hydrological perspective, but for resolution, the following new table could be inserted into Plan Change 7 recording the agreed allocation.

New table: Lake Opuha Tributaries Environmental Flow and Allocation Regime – AA, AN, BA Permits

River or Stream	Location of recorder site, or where flow is measured	NZTM Map Reference	Minimum Flow for AA, AN & BA Permits (L/s)	Partial Restrictions from 1 January 2025	Allocation Limit for AA, BA & AN permits (L/s)
Station Creek	Station Creek Gorge	5133978N 1429934E	As per existing resource consent conditions	Pro Rata	34.6

Unnamed tributary of the South Opuha	Immediately downstream of the take for CRC150164	5126110N 1427280E	As per existing resource consent conditions	Pro Rata	8.3
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3. UNRESOLVED ISSUES

- 3.1 Point (g) relates to stacking the AN allocation on top of the AA/BA allocation for determining the point at which partial restrictions commence. This was not a topic discussed during expert caucusing as it extended into how the allocations should be managed.
- 3.2 It remains my view that the AN allocation should be stacked on top of the AA/BA allocation when implementing any partial restrictions regime in the North Opuha, South Opuha, Upper Opihi and Te Ana Wai Rivers for the reasons outlined in my evidence in chief (Section 7). This could be achieved by way of Mr Ensor's recommended revisions to the definition of "Pro-rata Partial Restriction" that are set out in Attachment B to his primary evidence for Opuha Water Limited.

Keri Joy Johnston

27 October 2020