

Before the Central Otago District Council

In the matter The Resource Management Act 1991

And **A requested change to the Central Otago District
Council's Operative District Plan – Plan Change 14
(PC14)**

Supplementary statement of evidence of James Dicey

28 May 2020

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1 Introduction

- 1.1 My full name is James Dicey.
- 1.2 I have prepared a statement of evidence dated 20 May 2020. My qualifications and experience are set out in that statement. I confirm that this Supplementary statement of evidence is also prepared in accordance with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014.
- 1.3 In this Supplementary Evidence I have provided the list of issues Mr Dymocks Supplementary Statement of Evidence dated 26 May 2020 raises. Mr Dymock was asked a question by Commissioner Gillespie about whether additional water is available at the PC14 site and his responses to the question were captured as Supplementary Evidence. I have read this evidence and watched Mr Dymocks response on the recorded Livestream.
- 1.4 When presenting the executive summary of my evidence to the Commissioners I raised these additional issues and was asked by Commissioner Rae to record the issues that have been raised by the points Mr Dymock made. I additionally stated that, to my knowledge and understanding, that there was additional water available via the Ripponvale Irrigation Company Limited consent that was not able to be delivered through the current race infrastructure.
- 1.5 The key issues raised relating to water availability that Mr Dymock did not provide information on, to enable a complete picture on the availability of additional water to be formed, are as follows:
 - (a) Scientific evidence of the Cromwell Terrace aquifer size, location and capacity
 - (b) Evidence from the Otago Regional Council of the current allocation of the Cromwell Terrace aquifer and what water is consequently available for additional allocation

- (c) Who else has the ability to make an application for this water, as if all current properties have been allocated sufficient water for their farming they will not have the ability to apply for additional land water unless they undertake a change in land use
- (d) The location of any neighbouring bores to determine how far away they are from potential bore sites on the PC14 land. The location of the PC14 bore should also be shown to enable an understanding of where a new bore could be located in relation to the Cromwell Terrace aquifer without negatively affecting the operation of the existing bore on the PC14 land
- (e) Evidence from a drilling company who has sufficient experience with the Cromwell Terrace aquifer regarding the likelihood of both securing additional water and compromising the neighbouring bores
- (f) Evidence on how the Cromwell Terrace aquifer is recharged to determine whether modernising the race infrastructure and dam linings will materially affect this recharge. Additionally, evidence on how much flood irrigation is currently practised should also be presented.

1.6 Mr Dymock has, at paragraph 6 of his supplementary evidence suggested that the full available unallocated portion of water from the Cromwell Terrace would equate to 19l/s of water. He has suggested that this is sufficient to support approximately 25 hectares of cherries. Mr Dymock has not provided the manner in which he has calculated this figure. Using the methodology contained in my evidence this would instead equate to 58.52 planted hectares (applying the same 87.5% factor NZCC does). If 50% were made available by the ORC, as Mr Dymock suggested in his verbal evidence is more likely, this equates to an additional 29.26 planted hectares of cherries.

1.7 Mr Dymock has also stated in paragraph 4 of his Supplementary Evidence that additional water can only be sourced from bores. I have spoken to Mr Tim Jones, who is the manager of the Ripponvale Irrigation Company Limited (RIC), and he informed me that the RIC consent to abstract water was in excess of what is currently being delivered to the shareholders of RIC. He informed me that additional water is available to shareholders if the infrastructure was upgraded.

To my understanding Mr Jones has not presented evidence to this hearing and I recommend that this evidence is additionally sought.

- 1.8 I am also aware the Mr Simon Webb, who farms the property immediately to the East of the PC14 land, has additional water available on his consent that is not currently utilised and may be available to the PC14 site. To my understanding Mr Webb has not presented evidence to this hearing and I recommend that this evidence is additionally sought.

James Dicey

28 May 2020