

**BEFORE THE COMMISSIONER ON BEHALF OF  
THE OTAGO REGIONAL COUNCIL**

Application number – RM18.004

**UNDER** the Resource Management Act 1991  
**IN THE MATTER** of an application for resource consent  
by **Pioneer Energy Limited**

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**SUMMARY OF EVIDENCE OF WILLIAM JOHN NICOLSON**

5 July 2022

**OVERVIEW**

- 1.1 While I generally consider that my primary brief of evidence sufficiently addresses the key issues associated with this application, I consider it valuable to summarise the key issues and considerations provided in my evidence.
- 1.2 The applicant has sought to reach an amicable resolution with affected parties for several years since lodging the application, which has culminated in the development of the Lake Onslow Monitoring Proposal and a suite of conditions designed to impose monitoring, review and adaptive management to minimise any significant adverse effects on the environment due to the proposed increase in drawdown.
- 1.3 These conditions and monitoring proposal were formulated in part due to a lack of consensus on what constituted the existing environment, and therefore what to assess the proposed change against. I agree with Ms Pritchard's adoption of Wynn Williams' position on the existing environment in relation to the proposal. I also agree that on the basis of this and the anticipated negligible adverse effects on the environment, there is no need to adopt the suite of adaptive management conditions and associated monitoring proposal.
- 1.4 The Model created by Mr Jack provides a useful means of visualising the potential effects of the proposal in comparison to the existing environment by applying a "worst case" approach in line with the Wynn Williams' advice, whereby lake levels are modelled on the assumption that the relevant consents have been exercised to their fullest extent. There has been considerable discourse concerning the reliability or accuracy of the model, however I consider that the model with the 0.688 correct factor applied is sufficient in enabling the comparison of relative effects between the two relevant scenarios.

- 1.5 From an ecological perspective, there is consensus amongst several experts in their field (Ross Dungey, Annabelle Coates and Mark James) that the proposed increase in drawdown will not significantly adversely affect the ecology of Lake Onslow or the Teviot River. Based on my understanding, the ecological variables monitored and/or assessed by these experts directly contribute to angling quality and angler satisfaction.
- 1.6 Finally, the proposal is consistent with the relevant provisions of the NPSFM, NPSREG, Otago Regional Policy Statements and RPW. Of particular relevance is the NPSREG, which supports the increase of renewable electricity generation in line with national climate change goals, and which requires decision makers to avoid reverse sensitivity effects on existing renewable generation activities. Furthermore, the proposal is not inconsistent with the NPSFM policies and is very much consistent with Policy 4, which advocates management of freshwater as part of the country's response to climate change.

**William Nicolson**

**5 July 2022**

