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*in the matter:* of a submission on the Proposed Canterbury Regional  
Air Plan under clause 6 of the First Schedule of the  
Resource Management Act 1991

*to:* Environment Canterbury

*submitter:* Meridian Energy Limited

Brief of evidence of **Jane Whyte**

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Dated: 18 September 2015

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## **BRIEF OF EVIDENCE OF JANE WHYTE**

### **QUALIFICATIONS AND EXPERIENCE**

- 1 My full name is **Margaret Jane Whyte**
- 2 I hold the degrees of Bachelor of Arts and Master of Regional and Resource Planning, both from the University of Otago. I am a full member of the New Zealand Planning Institute.
- 3 I am a Director of ResponsePlanning Consultants Limited, a consultancy specialising in planning and resource management. I have been a Director of this company since 2004. Prior to this I was the Environmental Services Manager at Banks Peninsula District Council. I have over twenty two years planning and resource management experience working as both a local government planner and as a consultant.
- 4 I have worked throughout New Zealand. Since 1997 I have been based in Christchurch and much of my work has been within the Canterbury Region.
- 5 A core area of my planning and resource management practice is policy development and the evaluation of statutory planning documents prepared under the Resource Management Act. I have written, and been involved in the preparation of district plans, plan changes and variations (including privately requested plan changes). I have also evaluated a number of Regional Policy Statements, Regional Plans and District Plans. I have prepared submissions, further submissions and evidence on these. I am engaged for this work by both private clients and local authorities. Some examples of projects I have worked on are:
  - 5.1 Evaluating and preparing submissions on the Proposed Canterbury Regional Policy Statement, the Proposed Waikato Regional Policy Statement, the draft and Proposed Southland Regional Policy Statement and Proposed Plan Changes to the Clutha District Plan.
  - 5.2 Preparing submissions, further submissions and presenting evidence for nine of the Canterbury local authorities on the Proposed Canterbury Natural Resources Regional Plan, and the Proposed Canterbury Land and Water Regional Plan.
  - 5.3 As part of a three person team completing an evaluation of the effectiveness and efficiency of the Christchurch City Plan. As the sole author undertaking a similar project addressing four resource management topics in the Banks Peninsula District Plan.
- 6 Another area of my practice is the preparation and evaluation of assessments of effects and resource consent applications. This has provided me with the experience of implementing statutory planning documents, including Regional Policy Statements, Regional Plans and City and District Plans. I have worked on a range of projects and have sought and obtained land use consents, subdivision consents, water permits and discharge consents, including air discharge permits. I have experience with renewable electricity generation projects. I have provided advice and are working on projects involving both hydro and wind generation activities. Some of these projects were on sites with significant indigenous vegetation and habitats of significant indigenous fauna which involved consideration of biodiversity offsets. I have also completed applications on areas identified as outstanding natural features and landscapes.

- 7 I am well versed in the challenges of preparing effective statutory plans and the difficulties of implementing statutory documents that have not been properly prepared, ultimately increasing costs for applicants, submitters and councils.
- 8 I am a certified hearings commissioner the holding a Chair endorsement. I have acted as a Commissioner on Resource Consent and Plan Change applications.
- 9 I have read the Code of Conduct for Expert Witnesses and agree to comply with it. I confirm that I have complied with it in the preparation of this statement of evidence.
- 10 I provide the following declaration of conflict of interest. My husband is an employee of Meridian Energy. This relationship has not had any influence on my evidence and my opinion as an Independent Expert.
- 11 In preparing my evidence I have reviewed:
  - 11.1 The Proposed Canterbury Regional Air Plan (PRAP);
  - 11.2 The Summary of Decisions Requested Report;
  - 11.3 Section 42A report;
  - 11.4 The submissions prepared by a number of submitters to the Proposed Regional Air Plan, including the submission of Meridian Energy Limited;
  - 11.5 The National Policy Statement on Electricity Transmission 2008 (NPSET), the National Policy Statement on Renewable Electricity Generation 2011 (NPSREG) the National Policy Statement Freshwater Management 2014 (NPSFM).
  - 11.6 The Operative Canterbury Regional Policy Statement.

## **SCOPE OF EVIDENCE**

- 12 I have been asked by Meridian Energy Limited (*Meridian*) to prepare this statement of evidence. I address the submissions of Meridian in relation to the following matters:
  - 12.1 Objective 5.7, Policy 6.11 and Policy 6.19 addressing significant infrastructure
  - 12.2 Activity Status of discharges within setbacks from Sensitive Areas
  - 12.3 Aerial Spraying of chemicals
- 13 These matters address parts of Meridian’s submission and further submissions lodged on the PRAP.
- 14 Meridian lodged a number of submission points addressing the manner “black start” situations were addressed in the PRAP. I am advised that Meridian is no longer pursuing these submissions.

## EVALUATION OF MATTERS ADDRESSED

- 15 I have sought to ensure that my evidence is succinct and focussed on the points I address. However, I record that in undertaking my evaluation of the individual evidence points I have considered the relevant matters in the Resource Management Act including but not limited to Part II, Sections 15, 17, 30, 32 and 63-70B. I have also considered the other provisions in the PRAP.

### Objective 5.7, Policy 6.11 and Policy 6.19

- 16 Meridian lodged submissions supporting Objective 5.7, Policy 6.11 and Policy 6.19. These provisions enable nationally and regionally significant infrastructure. The objective and policies appropriately recognise the need for these activities to operate, be maintained, repaired, developed and upgraded. The provisions are:

*Objective 5.7 Nationally and regionally significant infrastructure is enabled and is resilient and positively contributes to economic, cultural and social wellbeing through its efficient and effective operation, on-going maintenance, repair, development and upgrading.*

*Policy 6.11 Recognise the contribution of nationally and regionally significant infrastructure to the region and national economy and provide for the operation and development of that infrastructure.*

*Policy 6.19 Enable discharges of contaminants into air associated with large scale industrial and trade activities and nationally and regionally significant infrastructure, in locations where the discharge is compatible with the surrounding land use pattern and while ensuring that adverse effects on air quality are minimised.*

- 17 Meridian in its submission seeks a minor change to Policy 6.19 to provide clarity that the discharges being enabled were associated with or necessary to operation nationally and regionally significant infrastructure. The recommendations in the Section 42A reports (R-5.7, R-6.11) are that these provisions remain unchanged. The recommendation on Policy 6.19 (R-6.19) is that the change sought by Meridian not occur, however a minor change is made to insert the words "fuel burning devices" after the words large scale. This change does not impact on Meridian. In considering the policy wording while the additional words sought by Meridian would provide greater clarity than I do not consider the change is essential.
- 18 In my view the Waitaki Hydro Electricity Scheme, including that part operated by Meridian is both nationally and regionally significant infrastructure. This is for the reasons I will now set out.
- 19 The National Policy Statement for Renewable Electricity Generation (NPSREG) identifies that the matters of national significance to which this national policy statement applies are a) the need to develop, operate, maintain and upgrade renewable electricity generation activities throughout New Zealand; and b) the benefits of renewable electricity generation. The NPSREG contains an objective and policies of relevance in particular the objective and Policies A, B and C. I have reproduced the key provisions in Appendix 1 in my evidence.

- 20 The Canterbury Regional Policy Statement (RPS) defines<sup>1</sup> Regionally significant infrastructure as including “National, regional and local renewable electricity generation activities of any scale”.
- 21 Overall, I support the submission of Meridian supporting these provisions. Providing enabling provisions relating to regionally significant infrastructure is necessary to give effect to the NPSREG and the Regional Policy Statement, particularly Objective 16.2.2, Policy 16.3.3 and Policy 16.3.5. Objective 5.1 and Policies 6.11 and 6.19 should be retained as recommended in the Section 42A report.

### **Activity Status of Discharges Public Amenity Areas**

- 22 Meridian lodged submissions raising concern that a number of the provisions (as notified) will negatively impact on the ability to maintain and operate the Waitaki Hydro Electricity Scheme (Waitaki HEPS).
- 23 The key concern is with a number of rules, particularly 7.37 and 7.38. In particular it is the separation requirements in absolute distance and within the property that the activity occurs on which are of concern. Rule 7.37 provides for the discharge of contaminants into air from the handling of bulk solid materials as a permitted activity provided a number of conditions are met. Permitted activity condition 6 is “the discharge does not occur within 200 m of a sensitive activity, waahi tapu, waahi taonga, or site of significance to Ngai Tahu”. Rule 7.38 provides for the discharge of contaminants into air from the outdoor storage of bulk solid materials as a permitted activity provided a number of conditions are met. Condition 5 is “the discharge does not occur within 100 m of a sensitive activity, waahi tapu, waahi taonga, or site of significance to Ngai Tahu”.
- 24 Slightly differently, Rule 7.36 provides for a discharge into air from mechanical grinding, cutting and shaping by application of heat, machining, welding, soldering or arc air gouging of metals as a permitted activity provided a number of conditions are met. Condition 3 is that the activity be undertaken in the open air, where the discharge is at least 20m from any sensitive activity beyond the boundary of the property of origin. An important distinction in this rule compared to Rules 7.37 and 7.38 is the reference to the sensitive activity occurring beyond the boundary of the site.
- 25 The PRAP describes a sensitive activity as “Means an activity undertaken: (c) a public amenity area, including those parts of any building and associated outdoor areas normally available for use by the general public, excluding any areas for services or access areas; or....”. A public amenity area is defined as “means those areas to which the public have a right of access under any statute, regulation, law, by-law, and are limited to; (a) Crown and Local Authority properties, reserves, gardens, and parks;” and “(d) pedestrian walkways, malls and precincts.”
- 26 Meridian’s activities relating to the operation of the Waitaki HEPS occurs on a combination of its own land holdings (core land) and by virtue of operating easements on land largely currently owned by the Crown and managed by LINZ – I am advised that overtime Meridian expects that LINZ may initiate alienation processes which would result in some of this land being owned privately. This is Crown land that the public have the rights of access to so falls within the term “public amenity area”. In addition, Meridian has confirmed third party rights

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<sup>1</sup> Definition of Regionally Significant Infrastructure page 198

of access over areas of its Core Land (for example, at Lake Pukaki in the vicinity of one of its rock storage sites to facilitate the Alps to Ocean Cycle Trail<sup>2</sup> and Te Araroa the National Walkway). Further, the area where the Waitaki HEPS is located in or adjacent to Statutory Acknowledgement areas.

- 27 The type of activities Meridian undertakes relates includes maintenance activities related to the Waitaki HEPS. The maintenance activities involve involves a range of activities including:
- 27.1 clearing of culverts and other structures of any build-up of rock, gravel and debris and storage of material removed for reuse or future removal from Meridian land.
  - 27.2 storage and use of rock on areas of Core land and land within the operating easement to be used for the maintenance of asset including rip rap structures, and erosion protection works around structures and the lake shore. In some circumstances larger rocks are broken down and reduced to an appropriate size to be used as part of the maintenance activities.
  - 27.3 lake and river control works.
  - 27.4 maintenance and repair of structures including grinding, cutting, welding, blasting, painting.
- 28 These above activities are and will continue to be a core component of maintenance and operation of the Waitaki HEPS.
- 29 Rules 7.37 and 7.38 are relevant to Meridian’s storage and handling of bulk materials – generally Meridian’s quarry, rock stockpiling, rock management and rock placement activities. I am advised by Meridian that there have not been complaints relating to these types of activities, including from its rock storage, rock resizing or maintenance activities. All of the discharge to air effects have been and will continue to be managed on the site to which the activities occur. The current setback requirements in Rules 7.37 and 7.38 mean that the maintenance activities undertaken by Meridian will not be able to occur as a permitted activity, not due to the nature or level of environmental effects that will result, but rather due to its physical location being a combination of Crown land, within the Statutory Acknowledgement Area and by having facilitated public access through its own core land. I consider that this is not an appropriate approach when addressing the Waitaki HEPS which is nationally and regionally significant infrastructure.
- 30 The focus for managing potential discharges should be based on managing the effects of the discharge, rather than the current approach that has an exclusion based solely on location. The current approach due the focus of the location rather than the effects of the discharge does not appropriately give effect to the NPSREG and the RPS in particular and does not effectively implement the objectives and policies of the PRAP:
- 30.1 NPSREG Policy Ba) that particular regard is had to the maintenance of the generation output of existing renewable electricity generation activities can require protection of the assets;
  - 30.2 NPSREG Policy Ca) that particular regard is had to the need to locate the renewable electricity generation activity where the renewable energy resource is available;

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<sup>2</sup> A diagram showing the location of the easement for the Alps to Ocean Cycle Trail through an area of Meridian’s Core Land is included in Appendix 2

- 30.3 NPSREG Policy Cb) that particular regard is had to logistical or technical practicalities associated with developing, upgrading, operating or maintaining the renewable electricity generation activity.
- 30.4 RPS Objective 16.2.2(1) providing for the appropriate use of the region's renewable resources to generation energy and Objective 16.2.2(6) to recognise the locational constraints in the development of renewable electricity generation, and Policy 16.3.5(4) which relates to maintaining the generation output and enabling the maximum electricity supply benefit to be obtained from the existing electricity generation facilities within Canterbury.
- 30.5 PRAP Objective 5.7, Policy 6.11 and 6.19.
- 31 Given the above provisions I consider that the focus of any rules should be on managing the actual effects of the discharge activity, not imposing a set setback distance that does not have a direct relationship with the management of effects. The rules as drafted will result in Meridian needing to obtain resource consent. This need to obtain resource consent is due to the proximity of Crown land, falling within a Statutory Acknowledgement area, and from Meridian in good faith facilitating public access over its Core Land. The consents will be required despite the fact that any effects are minimal. I do not consider this is efficient or effective.
- 32 The current provisions as drafted including Rules 7.37 and 7.38, in combination with the existing definitions of sensitive activities and public amenity area do not appropriately provide for the type of activities Meridian undertakes or the locational requirements of where any discharge must occur. I consider that the actual or potential effects of the discharge activities Meridian undertakes can be appropriately avoided, remedied and mitigated through compliance with appropriate permitted activity conditions without having the setback requirement.
- 33 Meridian in its submission provided a number of alternatives to address this matter including:
- 33.1 Changing the definition of sensitive activity and/or public amenity area to exclude the Waitaki HEPS from the definitions
- 33.2 Amending the rules where the setbacks apply, particularly 7.37 and 7.38 to exclude activities associated with the Waitaki HEPS
- 33.3 Providing a new rule to address discharges from the Waitaki HEPS.
- 34 A combination of one or all of the alternatives would address the issue of concern raised by Meridian. From a planning perspective I consider each option would work, but the development of a new rule would be the most effective. This is because it is the simplest with respect to drafting. It is also focused on the activities of Meridian and so will avoid unintended consequences of the rule being able to apply to activities not covered by the policy framework I have identified above. Any new rule should override Rules 7.37 and 7.38. The rule set out in the submission of Meridian specifically referred to managing dust. I suggest some minor rewording to the rule so it refers to 'contaminant' rather than 'dust' consistent with the terminology in Section 15 of the Act:

*The discharge of a contaminant beyond the boundary of the property of origin associated for any activities associated with the maintenance and operation of the Waitaki HEPS including*

*from storage or processing of any bulk material, or from any unsealed or unconsolidated surface at any one time is a permitted activity provided the following conditions are met:*

- 1. A dust management plan prepared in accordance with Schedule 2 must be held and implemented by the persons responsible for the discharge into air; and*
- 2. The dust management plan is supplied to the CRC on request.*

35 While I have provided some reasoning why I have advanced the above rule, I acknowledge there are a number of drafting options that can achieve the outcome sought and it is not of great consequence if an alternative drafting method is preferred.

36 I consider the above conditions would be appropriate to manage any actual or potential adverse effects. In particular I note that Rule 7.3 of the PRAP provides that the "discharge of odour, dust or smoke into air that is offensive or objectionable beyond the boundary of the property of origin when assessed in accordance with Schedule 2 is a non-complying activity". I consider the combination of the new rule and Rule 7.3 ensures that effects are appropriately managed.

37 The above will give effect to and implement the objectives and policies I have identified. I support the submission of Meridian and consider changes should be made to the provisions of the PRAP.

### **Discharges to Air from Weed Control Activities**

38 Meridian lodged submissions seeking to ensure that its weed control activities, including terrestrial and water based controls can continue. The submission sought that the rules in the PRAP provide for discharges to air as a result of its weed control activities. The relief in the submission was to either broaden the application in Rules 7.72 and or 7.73 so that they permit the activities of Meridian, or alternative insert a new rule to specifically provide for the discharges of Meridian.

39 Under Section 15 if a discharge is not from an industrial or trade premises and there is no rule controlling the activity then the activity would be a permitted activity. Rules 7.72 and 7.73 address agrichemicals. Meridian's activities are unlikely to fall within the definition of "agrchemical" in the PRAP as they are not "agriculture, horticulture or related activity". This contrasts with the "agrchemical" definition in the operative Land and Water Regional Plan which does not include this activity limitation. On this basis, the PRAP does not appear to regulate such a discharge to air as Meridian would undertake. As such, if this is correct, Meridian's activities resulting from aerial aquatic weed control are not regulated by the PRAP and Section 15 of the Resource Management Act 1991. If this is the intention then there is no need to amend the provisions. However, at the time of lodging the submission, and even now, Meridian is not confident that this is Environment Canterbury's intention. Therefore, I have addressed this issue.

40 The Section 42A report identifies that the discharges addressed in the Meridian submission would not be considered discharges to air and would be considered under the Land and Water Regional Plan. For the most part relying on the Land and Water Regional Plan is appropriate as Meridian's either directly applies the agrichemical to the target plant or into water. However, there are some circumstances where Meridian in conjunction with Land Information New Zealand undertakes aerial spraying of lake weed (such as in the Ahururi Arm of Lake Benmore) from a helicopter. These discharges are undertaken in accordance with the requirements of the Hazardous Substances and New Organisms Act and the discharge will not



have an adverse effect beyond the boundary of the target site. These weed control activities are an essential maintenance component necessary to ensure the electricity generation capacity of the Waitaki HEPS will be maintained as well as having significant public benefit in relation to the recreational value of Lake Benmore.

- 41 Even if Meridian's activities fell within the definition of 'agrchemical', Rule 7.72 may not provide for some of Meridian's activities because of the reference in Condition 5 to "site of significance to Ngāi Tahu". I am concerned with whether this condition provides sufficient certainty to enable its effective implementation. I have not found where the PRAP defines what are sites of significance to Ngai Tahu. Further Rule 7.73 would not apply at this time because of the link to the Biosecurity Act 1993.
- 42 Given the NPSREG and RPS framework I have discussed above, I consider that if it was intended for Meridian's activities to be controlled by the PRAP then the new rule sought by Meridian is appropriate as it will enable the aerial spraying of aquatic weeds. The rule is set out below:

The discharge of contaminants into air from the application of vertebrate toxic agent and/or herbicide is a permitted activity provided the following conditions are met:

1. The substance is approved under the Hazardous Substances and New Organisms Act 1996 and the use and discharge of the substance is in accordance with all conditions of the approval; and
2. The discharge does not have an adverse effect on vegetation or fauna beyond the boundary of the target site.

Dated 18 September 2015



Jane Whyte

## Appendix 1

### National Policy Statement for Renewable Electricity Generation Key Provisions

#### *Objective*

*To recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation.*

#### *A. Recognising the benefits of renewable electricity generation activities*

*POLICY A Decision-makers shall recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities. These benefits include, but are not limited to:*

- a) maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;*
- b) maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation;*
- c) using renewable natural resources rather than finite resources;*
- d) the reversibility of the adverse effects on the environment of some renewable electricity generation technologies;*
- e) avoiding reliance on imported fuels for the purposes of generating electricity.*

#### *B. Acknowledging the practical implications of achieving New Zealand's target for electricity generation from renewable resources*

*POLICY B Decision-makers shall have particular regard to the following matters:*

- a) maintenance of the generation output of existing renewable electricity generation activities can require protection of the assets, operational capacity and continued availability of the renewable energy resource; and*
- b) even minor reductions in the generation output of existing renewable electricity generation activities can cumulatively have significant adverse effects on national, regional and local renewable electricity generation output; and*
- c) meeting or exceeding the New Zealand Government's national target for the generation of electricity from renewable resources will require the significant development of renewable electricity generation activities.*

#### *C. Acknowledging the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities*

*POLICY C1 Decision-makers shall have particular regard to the following matters:*

- a) the need to locate the renewable electricity generation activity where the renewable energy resource is available;*
- b) logistical or technical practicalities associated with developing, upgrading, operating or maintaining the renewable electricity generation activity;*
- c) the location of existing structures and infrastructure including, but not limited to, roads, navigation and telecommunication structures and facilities, the distribution network and the national grid in relation to the renewable electricity generation activity, and the need to connect renewable electricity generation activity to the national grid;*
- d) designing measures which allow operational requirements to complement and provide for mitigation opportunities; and*
- e) adaptive management measures.*

*POLICY C2 When considering any residual environmental effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to*

*offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected.*

*D. Managing reverse sensitivity effects on renewable electricity generation activities*

*POLICY D Decision-makers shall, to the extent reasonably possible, manage activities to avoid reverse sensitivity effects on consented and on existing renewable electricity generation activities.*

*E. Incorporating provisions for renewable electricity generation activities into regional policy statements and regional and district plans*

*E2 Hydro-electricity resources*

*POLICY E2 Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for the development, operation, maintenance, and upgrading of new and existing hydro-electricity generation activities to the extent applicable to the region or district.*

Canterbury Regional Policy Statement Key Provisions

*Objective 16.2.2 – Promote a diverse and secure supply of energy*

*Reliable and resilient generation and supply of energy for the region, and wider contributions beyond Canterbury, with a particular emphasis on renewable energy, which:*

- (1) provides for the appropriate use of the region's renewable resources to generate energy;*
- (2) reduces dependency on fossil fuels;*
- (3) improves the efficient end-use of energy;*
- (4) minimises transmission losses;*
- (5) is diverse in the location, type and scale of renewable energy development.*
- (6) Recognises the locational constraints in the development of renewable electricity generation activities; and*
  - (a) avoids any adverse effects on significant natural and physical resources and cultural values or where this is not practicable, remedies or mitigates; and*
  - (b) appropriately controls other adverse effects on the environment.*

*Policy 16.3.3 – Benefits of renewable energy generation facilities*

*To recognise and provide for the local, regional and national benefits when considering proposed or existing renewable energy generation facilities, having particular regard to the following:*

- (1) maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;*
- (2) maintaining or increasing the security of supply at local and regional levels, and also wider contributions beyond Canterbury; by diversifying the type and/or location of electricity generation;*
- (3) using renewable natural resources rather than finite resources;*
- (4) the reversibility of the adverse effects on the environment of some renewable electricity generation facilities;*
- (5) avoiding reliance on imported fuels for the purposes of generating electricity; and*
- (6) assisting in meeting international climate obligations.*

*Policy 16.3.5 — Efficient, reliable and resilient electricity generation within Canterbury*

*To recognise and provide for efficient, reliable and resilient electricity generation within Canterbury by:*

- (1) avoiding subdivision, use and development which limits the generation capacity from existing or consented electricity generation infrastructure to be used, upgraded or maintained;*
- (2) enabling the upgrade of existing, or development of new electricity generation infrastructure, with a particular emphasis on encouraging the operation, maintenance and upgrade of renewable electricity generation activities and associated infrastructure:*
  - (a) having particular regard to the locational, functional, operational or technical constraints that result in renewable electricity generation activities being located or designed in the manner proposed;*

- (b) provided that, as a result of site, design and method selection:*
  - (i) the adverse effects on significant natural and physical resources or cultural values are avoided, or where this is not practicable remedied, mitigated or offset; and*
  - (ii) other adverse effects on the environment are appropriately controlled.*
- (3) providing for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation;*
- (4) maintaining the generation output and enabling the maximum electricity supply benefit to be obtained from the existing electricity generation facilities within Canterbury, where this can be achieved without resulting in additional significant adverse effects on the environment which are not fully offset or compensated.*

## Appendix 2 – Alps to Ocean





LAKE PUKAKI

Pukaki / Ohau Canal  
Overflow

Lot 1 DP 278224  
Meridian Energy Limited

Lot 2 DP 368484  
Meridian Energy Limited

P1 Rural Section 41582  
Glennamer Station Limited



**KEY**

— PROPOSED CYCLE TRAIL



SOUTHERN LAND  
CKL

SUBVERTING / PLANNING LAND DEVELOPMENT  
28 Edgarson St, Waiwaka, PO BOX 5077 Email: contact@southernland.co.nz

REVISION	DESCRIPTION	DATE
A	ORIGINAL ISSUE	31/01/12



**TRAIL ALIGNMENT - PUKAKI DAM  
MERIDIAN EASEMENTS  
ALPS 2 OCEAN CYCLE TRAIL**

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**PROJECTIONS**

**A2050** ALPS2 OCEAN CYCLE TRAIL

DESIGNED BY	DATE	CHECKED BY	DATE
AM	31/01/12	TD	31/01/12
APPROVED BY	DATE	APPROVED BY	DATE
AM	31/01/12	TD	31/01/12

SCALE: 1:7,500 @ A3  
DRAWING TITLE: NZMG  
PROJECT REFERENCE: O4050\_E1  
REVISION: A

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