

Before an Independent Hearings Panel
appointed by Christchurch City Council

under: the Resource Management Act 1991

in the matter of: the hearing of submissions on Plan Change 14 (Housing
and Business Choice) to the Christchurch District Plan

and: **Orion New Zealand Limited**
Submitter 854

Memorandum of counsel on behalf of Orion New Zealand
Limited

Dated: 9 May 2024

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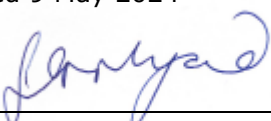
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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

- 1 This brief memorandum is filed for Orion New Zealand Limited (*Orion*). It relates to a matter discussed in the evidence for Orion and during Orion's hearing presentation at the Qualifying Matters hearing on 18 April 2024 – the mapping of Orion's lower voltage (11kV, 400V and 230V) lines.
- 2 As the Independent Hearings Panel (*IHP*) is aware, Orion is seeking a qualifying matter under section 77I(j) of the Amendment Act which would impose clearance distances for the lower voltage lines.
- 3 It was noted in evidence and at the hearing that it was not reasonably practicable to map Orion's lower voltage lines at that time, but that mapping of lower voltage networks is possible, for example, it is currently used in Auckland.
- 4 Since the hearing, a member of Orion's mapping team has returned from extended leave and reconsidered the matter. She has advised that the location of Orion's power poles can now be mapped with a much greater degree of accuracy than the lines. On this basis, the power pole locations could be mapped and a shaded setback applied to show the qualifying matter clearances distances for the lower voltage lines. This shaded setback could be incorporated in the planning maps.
- 5 While we indicated in legal submissions for Orion at the hearing that section 77L(c) of the Amendment Act (which relates to site-specific analysis) was already satisfied, the availability of this mapping would ensure that the requirements in this regard are fully satisfied.
- 6 We understand from the IHP's Minute 46 that some time will be incorporated in the remaining PC14 process for Council planning and GIS technicians to ensure the IHP's recommendations are reflected correctly in the planning maps.
- 7 On this basis, we considered it would be of assistance to the IHP to confirm that the lower voltage lines can indeed be mapped. If it would assist the IHP, counsel can arrange for Orion representatives to provide the relevant mapping to the Secretariat.

Dated 9 May 2024



J Appleyard / A Lee
Counsel for Orion New Zealand Limited