

Before the Independent Hearings Panel
at Christchurch

under: the Resource Management Act 1991 and the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

in the matter of: submissions and further submissions in relation to the proposed Christchurch Replacement District Plan

and: The Chapter 9 Natural and Cultural Heritage **Stage 3** Proposal

and: **Orion New Zealand Limited**
Submitter 2340 / F-2797

Memorandum of counsel for Orion New Zealand Limited

Date: 4 December 2015

Issue granted
JM Appleyard
4/12/15

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**CHAPMAN
TRIPP** 

MEMORANDUM OF COUNSEL FOR ORION NEW ZEALAND LIMITED

May it please the Panel:

- 1 This memorandum is filed on behalf of Orion New Zealand Limited (*Orion*), submitter 2340.
- 2 Orion considers that expert evidence on heritage matters is necessary to support its submissions on the Chapter 9 Natural and Cultural heritage proposal.
- 3 Orion acknowledges that it did not RSVP for an expert to attend the expert conferencing on heritage matters on 10 November 2015. However, Orion considers that expert evidence will be required to support the relief sought in its submissions.
- 4 Counsel for Orion respectfully requests that the Panel grant leave to allow Orion to call expert evidence from **Ms Clare Kelly** in regards to matters relevant to Orion's heritage substations and activities relating to utilities within and in proximity heritage items and settings.

Dated: 4 December 2015



JM Appleyard
Counsel for Orion New Zealand Limited