

**BEFORE THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN
HEARINGS PANEL**

IN THE MATTER of the Resource Management Act 1991 and the
Canterbury Earthquake (Christchurch Replacement
District Plan) Order 2014

AND the Christchurch Replacement District Plan

**STATEMENT OF EVIDENCE OF PENELOPE HELEN LEMON
ON BEHALF OF
ORION NEW ZEALAND LIMITED #3720
CHAPTER 13.13 – CENTRAL CITY UTILITIES AND ENERGY**

Planning Evidence
Dated the 14 January 2016

INTRODUCTION

1. My full name is Penelope Helen Lemon. I am a Resource Management Planner at Resource Management Group in Christchurch.
2. I have appeared before the Hearings Panel in relation to Stage 1 and 2 matters of the proposed Christchurch Replacement District Plan (pCRDP). My qualifications and experience are set out in my Stage 1 Chapter 5 (Natural Hazards) evidence.¹
3. I have been asked to provide planning evidence on behalf of Orion for Stage 3 Chapter 13.13, Central City Utilities and Energy.
4. The key documents I have used, or referred to, in forming my view while preparing this statement are:
 - (a) the notified Stage 3 Chapter 13.13 (Central City Utilities and Energy);
 - (b) the notified Stage 3 Chapter 11 (Utilities and Energy);
 - (c) the evidence of **Sarah Jenkin** for Council on Stage 3 Chapter 13.13, dated 16 December 2015;
 - (d) the evidence and rebuttal evidence of **Sarah Jenkin** for Council on Stage 3 Chapter 11 (Chapter 9 matters), dated 2 and 18 December 2015;
 - (e) the evidence and rebuttal evidence of **Sarah Jenkin** for Council on Stage 2 Chapter 11, dated 4 and 23 November 2015;
 - (f) the evidence of **Shane Watson** for Orion on Stage 2 Chapter 11, dated 18 November 2015;
 - (g) the evidence of **Shane Watson** for Orion on Chapter 13.13, dated 14 January 2016;
 - (h) the revised Stage 2 Chapter 11 following the conclusion of the Stage 2 Hearing, dated 18 December 2015; and
 - (i) the Chapter 3 Strategic Directions decision, dated 26 February 2015.

CODE OF CONDUCT

5. I confirm that I have read the code of conduct for expert witnesses contained in the Environment Court's Practice Note 2014. I have complied with the practice note when preparing my written statement of evidence.

¹ Evidence of Penelope Lemon, Stage 1 Chapter 5, dated 20 February 2015, paragraphs 3 – 5

6. I confirm that the issues addressed in this statement of evidence are within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

SCOPE OF EVIDENCE

7. My evidence relates to submissions made by Orion on Stage 3 Chapter 13.13. It is limited to the integration of Stage 3 Chapter 13.13 with Stage 2 Chapter 11.
8. The notified Stage 3 Chapters 11 and 13.13 include natural and cultural heritage matters. These matters are to be heard through the Stage 3 Chapter 9 (Natural and Cultural Heritage) hearing, and I have, therefore, not addressed these in this statement.

ORION NEW ZEALAND LIMITED

9. Orion owns and administers the electricity distribution network located between the Waimakariri and Rakaia Rivers and supply lines services to over 190,000 customers in Christchurch City and Selwyn District. Orion's core purpose is to consistently deliver a safe, secure and cost-effective supply of electricity.
10. **Mr Watson** of Orion in his Stage 2 Chapter 11 evidence² sets out that Orion is responsible for the operation, maintenance, upgrade and development of its network, which comprises underground cables, overhead lines, substations, transformers and associated structures. These activities are directed by National Industry Codes of Practice and Electricity Network Technical Specification Standards, as well as district and regional planning requirements.

EVIDENCE

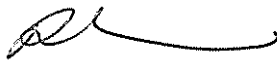
11. Orion's submissions on Stage 3 Chapter 13.13 seek to align and integrate the chapter with Stage 2 Chapter 11. Similar submissions have been made by others in relation to Chapter 13.13.

² Evidence of Shane Watson, Stage 2 Chapter 11, dated 18 November 2015, paragraphs 10 - 14

12. **Ms Jenkin's** evidence on Stage 3 Chapter 13.13³, includes a revised version of Stage 2 Chapter 11, which incorporates Stage 3 Chapter 13.13. In my view, **Ms Jenkin's** revised version of Stage 2 Chapter 11 appropriately incorporates Stage 3 Chapter 13.13. Noting that a further revised version of Stage 2 Chapter 11 was submitted by Council on 18th December 2015, and further iterations will be required to incorporate Chapter 9 matters.

CONCLUSION

13. My evidence is limited to the integration of Stage 3 Chapter 13.13 with Stage 2 Chapter 11.
14. In my view, the revised version of Stage 2 Chapter 11 in **Ms Jenkin's** evidence, which incorporates Stage 3 Chapter 13.13, is appropriate and will support Orion in achieving its core purpose to consistently deliver a safe, secure and cost-effective supply of electricity.



Penelope Helen Lemon

14 January 2016

³ Evidence of Sarah Jenkin, Stage 3 Chapter 13.13, dated 18 December 2015, attachment A
