Before the Greater Wellington Regional Council Proposed Change 1 to the Regional Policy Statement for the Wellington Region
Hearings Panel

Under	the Resource Management Act 1991 (the Act)
In the matter of	Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region **Hearing Stream Three -** **Rural land use activities, Forestry including vegetation clearance and Earthworks**
Between	**Greater Wellington Regional Council** Local authority
And	**Transpower New Zealand Limited** Submitter 177 and Further Submitter FS020

Speaking notes of Julia Marianne Kennedy for Transpower New Zealand Limited

Dated 30 May 2025

1.1. Tena koutou. Good morning Panel. My name is Julia Kennedy and I am the Environmental Consents and Compliance Team Leader at Transpower NZ Ltd. I am joined by Transpower's expert planner, Ms Whitney. I understand that my Evidence in relation to Proposed Plan Change 1 of the Natural Resources Plan (NRP), dated 5 May 2025, has been read prior, and I am here today to present a summary of that evidence and to answer questions from the panel on the activities that are carried out on the National Grid, and its access. We propose that Ms Whitney will follow with her presentation.

1.2. The National Grid is nationally significant infrastructure. It is infrastructure that is critical to the livelihoods of New Zealanders and should be appropriately provided for, whether that is the maintenance, upgrading and operation of existing assets, or the creation of new assets (including access).

1.3. Appendix A of my evidence lists and shows a map of National Grid assets in the Wellington Region, of which there are many, and include substations, transmission lines, communications sites, an electrode site and access tracks amongst others. Many of these assets are critical to security of supply for not just the Wellington region, but for all of Aotearoa, including the submarine Cook Strait cables that link electricity supply between the North and South Islands. Some of these assets, or access to them, are located near water bodies or the coastal marine area or otherwise traverse them.

1.4. Transpower's submission, as explained by Ms Whitney, seeks appropriate recognition and consenting pathways proportionate to the importance of the National Grid. That is, provision of access to and activities to maintain and upgrade National Grid assets, as well as build new assets if so required, so that security of supply is not compromised. This includes having appropriate enabling regional rules which do not unduly restrict essential work to be carried out.

1.5. I will now go through some key points of my evidence which I thought would be useful to provide context to the relief sought by Transpower insofar as these relate to the topics of relevance within Hearing Stream 3 for Transpower, being Earthworks and Vegetation works.

Earthworks

1.6. Paragraphs 32-39 of my evidence provide an overview of the typical earthworks and activities that Transpower undertakes, including how these activities are managed. These are activities that need to be carried out anywhere on the National Grid including where these are near, or within, freshwater, and include earthworks required for both existing and new assets.

1.7. Typical earthworks are associated with development and maintenance at substations and transmission line support structure installation, foundation strengthening, upgrades and replacement works. The photos provided in Appendix B of my evidence show some examples of transmission assets in close proximity to waterbodies, as well as provide context to the scale of typical routine work that is carried out day-to-day to ensure the Grid is fit for purpose in its role of providing a secure electricity supply.

1.8. As well as work carried out on assets themselves, having the ability to safely access all parts of transmission infrastructure is crucial. Having land access, where possible, is preferred and the ability to carry out work on access tracks is a routine activity on the National Grid. I have included the need for access in my evidence, but in summary, it is often activities involving access work that are located in or near freshwater bodies. So, while structures themselves may not be located in waterbodies, the access to them might cross them, or be located next to them.

1.9. In relation to the proposed rules relating to earthworks, specifically with reference to Ms Vivian's rebuttal evidence, I concur with Ms Whitney's opinion that the rule framework has been complicated by having two rules that provide for National Grid assets. The preference is to have one clear permitted activity rule that sufficiently enables work on National Grid assets, including access, but will equally have appropriate management provisions to avoid, remedy and mitigate any potential adverse effects.

1.10. To provide context, as currently worded, Rules WH.R23A and P.R22A do not permit earthworks within 5m of a waterbody. I consider this will unduly restrict Transpower from being able to carry out even the most straight forward of maintenance activities on structures and on access tracks and approaches to waterway crossings, without the need for a resource consent. This is work that is essential, it must take place to ensure a sustainable and secure electricity network, and without delay. Transpower

has well established processes and procedures to manage earthwork activities and either avoid or minimise the adverse effects.

1.11. In my view, the permitted activity conditions recommended by Ms Whitney as set out in Appendix A of her speaking notes, as well as the conditions under Regulation 30 of the Resource Management (National Environmental Standard for Electricity Transmission Activities 2009 (NESETA), the relevant conditions of the Resource Management (National Environmental Standard for Freshwater) 2020 (both of which will apply in addition to the regional plan rules) as well as Transpower's internal environmental management requirements will address the objectives of Plan Change 1 in relation to freshwater quality.

Vegetation works

1.12. As explained in paragraphs 40-49 of my evidence, managing the effects of vegetation on the National Grid is a continuous task for Transpower. Vegetation growing too close to existing National Grid transmission lines (including associated access tracks) can pose a potential hazard to life, property and the environment, and a threat to the security and reliability of the electricity supply system.

1.13. While not over-riding RMA obligations and requirements, Transpower has a legal requirement to maintain its lines to minimise any tree-related interruptions to the supply of electricity. I support the Section 42A Report ("s42A") recommendations pertaining to vegetation clearing and trimming provisions.

Conclusion

1.14. To conclude, my evidence as filed, and my summary today, highlights the importance of an enabling framework to appropriately allow work to take place on the National Grid. Transpower supports the necessary management of activities to ensure improvement in freshwater quality and I believe this can be done by good and robust permitted activity conditions, particularly where this work must take place, without unnecessary delay and unnecessary consenting costs, to ensure the ongoing security of electricity supply to Wellington and Aotearoa.