

NRP PC1 Hearing Stream 3 Speaking Notes – Louise Askin

28 May 2025

Introduction

- Tēnā koutou. I'm Louise Askin. I was the co-chair of TWT Whaitua Committee and I also represented my rural community on the committee. It's great that two of my committee colleagues spoke in earlier hearing streams – and Diane just before.
- I also work closely with farmers and small block owners across the Mākara/Ohariu catchment, facilitating revegetation and stream/wetland restoration projects as part of a local community group. We've seen a big increase in revegetation work in our community over the last seven years.
- The focus of my submission, and my comments today, is how council can best use the NRP to support Wellington's rural community as long-term, enduring and invested kaitiaki of the bulk of the whaitua's streams. The good thing is – the council already has a Plan for this – the WIP (and Te Mahere Wai)! So my focus is really on how well has PC1 implemented the community's recs.
- Note that my submission only looks at a subset of the PC – farms w over 20ha grazing land and some aspects of small blocks but not earthworks, veg clearance, forestry (due to time limitations).

Recap on the whaitua process

- GWRC took the impressive approach of running a collaborative decision-making process with their communities and mana whenua to give effect to the NPS-FM – bringing together diverse views to create a plan. That process aimed to integrate scientific rigour with community drivers/aspirations and mana whenua values. It was a big job over several years and produced this Programme.
- Tim Sharp said in Hearing Stream 2, "*the foundations for this plan change are the two whaitua processes*". That was the intention at least. We produced 111 recommendations to help achieve target attribute states over time and we set a pace of change toward an end goal of "wai ora" / healthy water. It is important to note that we did not say "get to these TASs in whatever way possible" – we set out recs for how to do it. The process also highlighted where GW might be more stringent than the national rules – based on local issues and community values.
- Thanks to the rural community, especially my own in Mākara and Ohariu, for engaging in the whaitua process and helping shape our rural recs. Our final recommendations reflected their perspectives and I share their disappointment that this didn't flow through into the notified Plan Change.
- To test our committee's thinking, I also ran the draft rural recs past Federated Farmers to give them a real grill. I told Federated Farmers that if they engaged on this then it there wouldn't be much to fight about at the Plan Change stage! Shout out to Liz McGruddy, previously from Federated Farmers, for the constructive input she provided to me and Diane during both the whaitua process and notified PC stage.
- We presented our WIP and Te Mahere Wai to GWRC and the city councils in late 2021.

Notified Plan Change

- The council then drafted the PC to reflect aspects of our work. Council didn't engage the Whaitua Committee during the drafting process despite a "Whaitua Reference Group" being formed.

- Two years on, GWRC notified their PC. It was an incredibly fraught period as people discovered proposed rules wildly different to what the community had recommended – and they experienced no meaningful engagement from council except for one fateful workshop in Ohariu. The notified PC largely ignored the WIP's rural recs and also the people who look after the land. There had been a significant disconnect within the council between their whitua implementation work and their drafting of the PC – so it appeared.
- The notified Plan Change proposed broad rules, tight timeframes, massive financial and social impacts and barely any of the non-regulatory support measures that we deemed essential for improving water quality – things that *can* sit as methods or provisions in a Plan.
- It is important to recognise that rural land and water management is about people – stewardship, kaitiakitanga and behaviour change within communities. The WIP recs had acknowledged a range of levers that would support the community in their role but the PC seems to rely on rules in isolation.
- Non-regulatory methods also provide people with the missing information or resourcing they need for on-farm work. Councils across the country see huge levels of revegetation and stream protection through their voluntary, non-regulatory programmes. My neighbours here will touch on some of the voluntary actions that they've taken on their farms.
- I also want to just briefly note that normal people cannot engage in this type of council planning process – the amount of reading, understanding, time required. The whitua process was well designed to engage community – but it then relied on the council honouring and implementing its recommendations.

General comments on GWRC's proposed changes to PC1 in response to submissions

- The proposed changes in response to submissions do a much better job of implementing the WIP recs. Therefore, I do support most of the proposed changes.
- In saying this, I would still like to see more of the non-regulatory methods proposed in the WIP also included in PC1.
- An interesting development in the recently proposed changes since notification is that the council has clearly had enough of central government's delays in updating the national freshwater programme and has decided to make their own cFEPs mandatory in this area and create their own mandatory low-slope stock exclusion map. Our Whitua Committee relied heavily on the government's planned FWFPs and stock exclusion rules – hence our recs mainly focusing on non-regulatory methods.
- I don't disagree with this move but I do want to flag a couple of real risks to manage:
 1. The council now becomes the "bad guy" rather than central government. This will jeopardise their ability to partner with the community.
 2. Adding two very significant rules at this late stage, after most submitters have already done their bit and checked out, isn't great for community awareness. I suspect very few people know that council have proposed a compulsory stock exclusion map and mandatory FEPs.

Specific provisions

- **Farm Environment Plans.** I support the use of cFEPs though noting the risks arising from them being compulsory. Farm plans are often a constructive, informative tool for landowners, when voluntary. I support Jamie Peryer's comment that there must be a plan for them to integrate with FWFPs when/if they come to pass - to reduce duplication. This is currently unclear in PC. On Monday, someone mentioned that "collective responsibility is the only way to manage" the achievement of a TAS. That may be true with a scientific-modelling lens but not for practical assessment/mitigation in the catchment – that must be done at the farm-scale.

- **Small properties.** I support removing the N monitoring requirement – a high regulatory burden for little benefit. However, I also support the "method" to investigate what's happening in those blocks since the Whaitua Committee highlighted the potential influence of these properties on e-coli. I also support the low-slope stock exclusion rules being applied to small properties since they are usually located along the main streams in our catchment.
- **Streambank erosion risk map.** It's good to see acknowledgement of streambank erosion. However, I'm not confident the map will provide any value compared with an on-site assessment, given the site-specific nature of this particular issue.
- **Stock exclusion.** The Whaitua Committee expected some compulsory low-slope stock exclusion to occur since MfE was proposing it at the time. I'm just unclear how well-designed this particular GW-produced map is (given that MfE took two years or so to refine theirs). I'm also unclear to what degree it's expected to reduce e-coli levels versus reduce sediment levels. Our Committee asked for horses to be included given their higher stocking rates in Mākara/Ohariu and they haven't been.
- **Sources of e-coli.** There is an assumption that livestock are likely to be the main source of e-coli in the Mākara/Ohariu catchment. However, the WIP notes that farming is very low intensity and the source could also be septic tanks, horse grazing or avian. We need better data on the source of e-coli. We also need a feedback loop for local water quality monitoring data to refine the application of rules as new information comes to light.
- **Small Streams Riparian Programme.** I support the removal of this. I also support the discretion provided to farm adviser/certifiers around the retirement of small streams in cFEPs. However, I acknowledge that small streams are particularly valued in Te Mahere Wai so I only support these two things knowing that cFEPs *will still* assess risks and mitigations for small streams.
- **Sediment / Erosion / Revegetation.** I support the more accurate naming of maps, the focus on "highest potential erosion risk" land, and use as a guide for cFEPs rather than mandatory treatment areas. These catchments are not high erosion risk and the proposed approach was not proportionate to the risk.
I support the farm-scale assessment through a cFEP to provide better assessment of actual risk therefore tailored mitigation - normal practice across New Zealand. I support James Blyth's comment that the map is best used as guidance and ground-truthing is needed.
I support the proposal to allow a wider range of "appropriate erosion control treatments" to mitigate erosion. "Woody vegetation" is ideal but just not viable in many mapped areas due to the harsh environment, presence of wind farms, etc. And people need flexibility to innovate.

Brief wrap-up

- The first two days of this hearing focused on the reasonably clinical approach taken to developing the PC – modelling (based on imperfect data), attribution of impacts to activities (contested by different submitters), discussions on rates of change, and solutions that are largely based on rules in the council plan.
- I ask you as commissioners to consider how the PC can *best support the rural community* to own long-term, enduring change – not just what will tick the NPSFM box – a process that is changing with successive Government administrations.
- There is a lot of good change proposed but also a lot of room to better support the hard work done by the two Whaitua Committees – and the implementation of their recommendations.

Response to question re Faecal Source Tracking

One of the questions presented by commissioners to the Mākara/Ohariu speakers was around the source of e-coli. Michael Greer commented that GWRC had been supporting FST through the Mākaracarpas group and was waiting on results. Louise responded that it was actually a small-scale initiative led by a community group with funding from Meridian. And that a much more thorough study is required by GWRC if that data is to support rules in the NRP.