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Attention: Team Leader – Governance and Support  
Palmerston North City Council  
Private Bag 11034  
Palmerston North

### **Submission on the Manawatu River Framework**

We thank you for the opportunity to provide feedback on the Framework.

#### **About Environment Network Manawatu**

Environment Network Manawatu (ENM) is a charitable umbrella organisation dedicated to enhancing the Manawatu environment. We receive funding from PNCC, Lotteries, ECCT, COGS, and project funding from additional organisations. We currently have forty-five active member groups, forty of whom are currently based in and/or routinely active in Palmerston North.

A number of ENM member groups are actively involved in restoration and other activities in areas close to the Manawatu River (and within the scope of the Framework). They include RECAP, Friends of Waitoetoe Park, Forest & Bird Manawatu Branch (and their junior branch the Kiwi Conservation Club), Te Araroa Manawatu (the long pathway) Te Kauru Eastern Manawatu River Hapu Collective, Tanenuirangi Manawatu Inc., C T Keeble Memorial Forest Trust, Green Corridors and the NZ Landcare Trust.

ENM would like to see the Manawatu River Framework well integrated with council's biodiversity and vegetation strategies, in particular around native species. Within many of the groups named above and other groups within ENM there is considerable knowledge and expertise in the biodiversity area, which is being brought together through the development of a biodiversity cluster (or sub-network) within ENM. We would welcome the opportunity to be actively involved in further discussions so that the right connections can be made with respective member groups and the biodiversity cluster.

This submission has been written in response to initial comment on the framework from our member groups. It has been revised in response to further member group feedback.

#### **General comments**

ENM fully supports PNCC's key aims on page 4 of the framework and we believe the river and surrounding environs will benefit from this coordinated approach. We agree that formalising and consolidating the links between the river and the city, and encouraging use of the riverscape, will enhance the connection between people and the river, which in turn should provide more support for actions required to improve the health of the river.

We largely agree with the scope that has been identified, however we note that the area designated as Rural West on the map on page 6 does not match the actual description and boundaries of this area on subsequent pages. This map needs to be changed to accurately represent which area is covered by the

Rural West zone and to eliminate any confusion. We would also support an extension of the rural west zone to encompass more of the Mangaone Stream. This is a major watercourse that runs through Palmerston North, yet in its current state appears as little more than an open drain. The Mangaone Stream would benefit from the long term planning approach presented in this framework and this would provide a further mechanism to link more people to the river environs.

We generally support the development of further forested and wetland areas along the river's margins as a means of improving the river environment and at the same time creating destinations for recreation and enjoyment.

### **Links from the city to the river**

There is emphasis in the Framework on sprucing up the entrances to the river park. While we accept that this may make the entrances more attractive, we don't think that investment in these entrances will attract more people to the river park because almost none of the entrances are on main roads of the city. We submit that more planning and focus is required around how to link the city to the river. To make the park successful, and to attract more people to the park there needs to be very clear linkages between the city and the river, whether through signage, vegetation or some other means needs to be evaluated. The goal should be to ensure that any visitor to the city, as well as city residents, are aware of the river park, and what it offers and how to get there.

### **Infrastructure and flooding**

Any infrastructure that is situated in floodable areas of the park needs to be resilient to floods. For example, the recent June floods destroyed a number of walkway signs and seats. If additional signage and interpretation is to be placed along the walkway, serious design consideration should be given as to how to make these structures better able to withstand the floods.

### **Shared pathway – conflict management**

There needs to be some recognition and management of potential conflict between different users on the shared path. There is already a degree of conflict present between different users and with the increasing popularity of the shared path for recreational use as well as its continued and increasing use for bicycle commuting as well as a potential increase in mobility scooters on some sections there is a need for proactive promotion of the 'share with care' philosophy which reminds all users to respect others and does not create any hierarchy. Such campaigns have been very effective in Wellington on the waterfront and in many other places (e.g. NP Coastal Walkway). Ideally, PNCC can learn from these successful campaigns and should work with user groups to develop a creative campaign (signage and other interventions) to run as early as possible in the coming summer months.

### **Stormwater**

We accept that the primary focus of the Framework is to "coordinate investment and promote activation of the margins of the river as opposed to promoting significant improvements to water quality" (page 14). However, we also see that inherent within this planning framework are numerous opportunities to help enhance water quality as part of an aesthetically pleasing river park concept and we would like to see these opportunities developed further. For example, stormwater discharge to rivers is likely to be one of the next big challenges facing local government, because of increasing standards in what people are willing to accept. Although new subdivisions are subject to more stringent stormwater requirements, much of PNCC's stormwater, complete with its load of contaminants, runs untreated into the river. This framework is the perfect opportunity to identify where areas of the river margin could be used to create planted wetlands, to retain and treat stormwater during river low flow conditions, prior to river discharge.

The wetlands that are being developed at Edwards Pit Park through the diversion of stormwater are a good example of what can be done. They provide multiple benefits - enhancing the area for users of the park, filtering stormwater, replenishing groundwater and attracting birdlife. The Framework in its current

state neglects to identify areas where other wetlands might be developed and we believe this is a missed opportunity.

### **Time frames for implementation**

We are pleased to see there are specific actions and time frames contained within the Framework. These are essential to make sure there are clear and measurable outcomes and this helps to ensure the Framework is implemented.

We note that funding for implementation is not scheduled to begin until the start of the 2017/18 financial year. If implementation does not start for another 2 years from now, the time frames listed in 10.1 are somewhat misleading. For example, actions listed in the 'Immediate (1-3 years)' time frame will not be implemented immediately, but will be implemented in 3-5 years from now. We submit that the funding should be brought forward to the 2016/17 financial year.

This project is important and is potentially the heartblood of the city. Although the timeframe of 30 years may be necessary for some parts of this project, we would like to see as much of the work as possible scheduled for implementation within a 10 year time frame.

We consider the actions involving rehabilitation and ecological restoration to be a high priority. As stated in the draft Framework, these have the added benefit of improving water quality, but they will take considerable time to become established. Therefore the sooner these actions are undertaken, the greater the benefits are for downstream river users. We would like to see progress on these actions within the immediate time frame. We recognise there are budget restraints but there may be opportunities for more community engagement.

### **Ecological input**

We acknowledge that this framework is primarily a planning document but we submit that it is essential to have comprehensive ecological input into the processes outlined. There are a number of areas of the Framework that demonstrate the absence of ecological input. The Framework provides an opportunity to include restoration of the river corridor for the benefit of our native fauna and flora, therefore it is crucial that understanding of this process and these opportunities is developed alongside the planning process.

This input is required at two levels – firstly in ensuring that the analysis and detail of the current state is accurate. For example, on page 27 in the description of birdlife present at Waitoetoe Park, it states that there are kakariki present. Kakariki are an endangered species that are largely absent from the North Island mainland, so the description is probably mistakenly referring to the presence of eastern rosellas in the park – these are an introduced species and their presence is potentially detrimental to many native species.

In addition, the description of Waitoetoe Park states the native harrier is present yet omits to note that the much rarer NZ falcon is a regular visitor to the park. Part of enhancing the river park should be enhancing the type and quality of habitat available to support our native species, and correctly understanding what is present is a crucial first step to determining which actions are required to achieve the best outcomes.

The second reason ecological input is required is to ensure that any proposed actions have been thoroughly evaluated for their impacts on the native habitat and species in the river park. For example, it is noted on page 55 (and again on page 72) that a vegetation management strategy is required to address the vegetation creating a 'buffer' to the river in the Esplanade area. This indicates that the forest remnant is viewed as a barrier to sight lines between the Esplanade and the river, rather than being viewed as a valuable section of forest in an otherwise denuded landscape.

Previous conceptual plans (developed by PNCC in 2006) for the re-development of the Esplanade proposed to bulldoze several sight lines through the Esplanade Bush, and this approach unfortunately appears to be retained in this river framework. Removing corridors of bush to provide a broad path to the river can have implications for the health of the surrounding bush and will reduce the already limited amount of habitat present for native bird species. A planning approach sees this buffer as merely requiring vegetation management, but an ecological approach has a broader understanding of the wider scale implications.

It would also be good to see consideration of habitat enhancement included in the framework, for example, plans to include predator control programmes in the Esplanade and Waitoetoe Park would potentially enhance the native bird populations, which in turn enhances the experience of using the river park. This is where including ecological input into the process would be valuable in identifying opportunities that could be incorporated into the Framework.

### **Specific comments**

Page 25 – Note the description of the Manawatu Gorge Biodiversity Project, or Te Apiti, needs adjusting. There are iwi and local community groups who are also partners in this project and they have been omitted from the description. Also, the project is not coordinated by DOC but has been governed collaboratively. A new governance arrangement is currently being established and the description should be updated to reflect this.

Page 52 – Route of shared pathway from Linton Army Camp to Fitzherbert Bridge. We understand that the route outlined on this page is not achievable because it would have to cross army land and it is proposed instead that part of the pathway crosses through the Greenwood Planting at Keeble's Bush. This is a privately owned scientific reserve and contains a regionally significant bush remnant. We submit that if the shared pathway must cross through this reserve that every attempt is made to create a non-invasive pathway through the use of bridging or a flyway that passes over top of the canopy.

Page 72 –Section 10.1 proposes to cover the length of the urban pathway with asphalt, including the section through Waitoetoe Park that is currently lime chip. We submit that this end of the walkway is more of a wilderness area and that it would be inappropriate and expensive to cover this section with asphalt. We understand that the natural and undeveloped character of this area is highly valued by locals and others currently using Waitoetoe Park. We also understand that the wilderness areas within are already being utilised as a natural, adventure play space and this could be encouraged further. Any enhancements should be in keeping with the park's natural character including the bush remnant.

### **Closing:**

ENM encourages PNCC to continue to engage with the community around the development of the River Park as the framework is implemented. As stated above we would welcome the opportunity to be actively involved in further discussions.

Yours sincerely,

Alastair Cole  
**ENM Co-chair**