

# **Waimea/Waimeha River Park Management Plan**

**Draft: April 2025**

Submission by: Nature and Climate Group, Nelson Tasman Climate Forum

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## **Introduction**

We thank Tasman District Council for the opportunity to comment on the revised Draft Plan for the Waimea/Waimeha River Park. We commend the approach Council has taken in prioritising an ecological approach to management within the constraints of the primary purpose of the Park, incorporating te ao Māori and giving voice to iwi, including iwi aspirations for the awa.

We acknowledge that the Park comprises a relatively small, linear parcel of land, forming only a small portion of the Waimea River catchment. As such, the Park is highly influenced by activities outside the Park boundaries, particularly those occurring upstream in the Waimea, Wai-iti and Wairoa Rivers and their catchments. This limits the effectiveness of some management activities that are proposed for the Park.

The small size of the Park is also problematic with numerous competing purposes and outcomes, some of which are incompatible with one another, such as maximising ecosystem health and biodiversity outcomes while continuing commercial productive and extractive activities. In reading the Draft Plan, it is not entirely clear how all of these competing purposes will be achieved within the confines of the Park.

In providing further comments to Council at this stage of the consultation process, we refer Council to our submission made in August 2024, and the recommendations therein. We acknowledge with gratitude that a number of these recommendations have been included in the Draft Plan, and urge Council to incorporate those recommendations not yet included.

This submission concentrates on responding to the five consultation questions by addressing the individual policies within the Draft Plan. Our recommendations to Council are highlighted in bold.

## **Policies**

### Policy 1: Flood management and soil conservation

Overall, we support the policies outlined in this section and support the broad approach of applying an ecological lens to management, including using green and soft engineering techniques wherever possible, for example for bank stabilisation.

However, there is one key element missing from this policy and from the Draft Plan as a whole – the impact of climate change. While there is acknowledgement of the likelihood of much higher intensity flood events in the future, there is no discussion of whether the current infrastructure is fit-for-purpose in protecting adjacent land and assets under these conditions.

It is unclear whether the Rivers Activity Management Plan provides information about expected flood intensities and frequencies under different climate change scenarios, and the levels of service required to protect land and assets. Without this information, it is not possible to determine whether the primary aim of the Park can be achieved in the future.

The consequences of a flood event breaching the stopbanks within the Park is also not outlined in the Draft Plan – the Plan assumes the flood mitigation measures in place are adequate for now and into a warming future.

**We recommend** Council includes a section in the final Plan that articulates the expected flood severity in the Waimea River as the climate warms and the risks posed to the Park's flood protection infrastructure by such floods. This should include a description of the consequences to the Park if the stopbanks are breached, and appropriate management that can minimise these risks.

The Draft Plan does mention that abnormally low flows are also likely to be increasingly normal with a warming climate, but that the Waimea Community Dams provides a means of mitigating these low flows within the Park.

**We recommend** Council includes a section in the final Plan outlining modelling of the likelihood of low flow that will adversely affect the ecosystems and biodiversity within the Park, and whether the additional inputs from the dam will be sufficient to mitigate these low flow conditions in extreme circumstances. If this is not possible, then the risks to the ecosystems and biodiversity within the Park need to be highlighted in the final Plan.

#### Policy 2: Water quality

We agree that water quality is fundamentally important and urge Council to ensure that, as outlined in Policy 2.1.1, water quality is prioritised over other activities in the Park.

In developing riparian buffers (Policy 2.1.2), **we recommend** Council ensures that they are of sufficient width and contain appropriate native plant diversity to capture the range of terrestrial pollutants before these reach the waterway. For example, ensuring a wide buffer of graminoids can be more effective at trapping nutrients such as nitrates and phosphates than shrub or tree plantings.

**We recommend** Council removes all dumped material in the historic landfill site in the Waimea Delta as a matter of urgency, to prevent further contamination (Policy 2.1.4).

### Policy 3: Threatened and taonga species protection

Within the area of the Park, the Waimea Delta provides essential habitat for a number of highly threatened and/or significant species. As noted in Policy 4.1.3, it is expected that this area will be protected as a Nature Reserve, as soon as possible.

As the Draft Plan notes, throughout the Park there are other areas with high biodiversity values and areas with lower values. We support Council in Policies 3.1.1 – 3.1.6, particularly in excluding all adverse recreational and productive activities in areas with high biodiversity values, especially during key periods of the year such as nesting seasons for bird populations. This includes excluding use of motor vehicles, dog access, horse-riding, grazing and gravel extraction activities in these areas either permanently or seasonally, as appropriate.

### Policy 4: Restoration of native habitats

We fully endorse Objective 4.1 to restore and enhance ecosystems and habitats within the Park, and the policies underpinning this objective.

In particular, we endorse Policy 4.1.3 to protect the Waimea Delta area as a Nature Reserve, and **we recommend** Council ensures that once given this reserve status, that all recreation activities are prohibited from within the reserved area, to maximise outcomes for ecosystems and biodiversity.

As noted above, there is no explicit discussion of the impact of climate change on the ecosystems and values of the Park and in the Waimea Delta area, rising sea-levels and increasing storm surges have the potential to adversely affect the ecosystems and biodiversity contained therein.

**We recommend** that in the final Plan, Council models potential climate change impacts on the Waimea Delta and outlines management options to limit the adverse consequences of these impacts.

### Policy 5: Invasive species control

Overall, we support the policies outlined in this section and support the broad approach of prioritising invasive species control to ensure protection of important ecosystems and biodiversity values, and recreational use of the Park.

We endorse Policy 5.1.3 to use native species wherever possible for bank stabilisation and erosion control, and **we recommend** Council use willows or poplars only as a last resort, due to their invasive tendencies.

To decrease the populations of invasive species within the Park, **we recommend** Council partners with adjacent and upstream land-owners to decrease populations of significant invasive species, as a component of Policy 5.1.4.

#### Policy 6: Cultural heritage protection

Overall, we support the policies outlined in this section and support the broad approach of partnering with iwi in the management of the Park.

#### Policy 7: Landscape protection

Overall, we support the policies outlined in this section and support the broad approach of protecting and enhancing the landscape values of the Park.

#### Policy 8: Community use and enjoyment

As noted above, it is unclear how the potential conflicts between community use of the Park and maintaining and enhancing environmental outcomes will be managed. Ensuring recreational pursuits do not adversely affect ecosystems, biodiversity or cultural heritage sites relies on users being both well informed and willing to adhere to Council guidelines and mandates on appropriate behaviour in specified areas. Significant damage can be wrought by a single instance of ill-informed behaviour or wilful anti-social behaviour, both of which are difficult to prevent and police.

Education, both passive, through interpretation boards and signage, and active, through engaging the community in Park management activities, is key to encouraging respectful behaviour by all Park users.

**We recommend** that Council partners with both the local and broader community in undertaking management and restoration activities within the Park, such as planting and invasive species control. In association with community and recreational groups, Council could hold information/open days and bird-watching events to highlight the environmental and values of the Park, providing the opportunity to encourage people to use the Park respectfully.

Including iwi, schools, businesses, recreational groups and local landowners in such activities provides opportunities for education and for fostering a sense of ownership for the Park. Through such initiatives, it may be possible to decrease the likelihood of anti-social activities, such as rubbish dumping, overnight camping and off-road vehicle use in sensitive areas.

#### *Objective 8.1: Providing for recreational activities*

We support the policies underpinning this objective, with two exceptions:

8.1.4 'All areas of Park available for public use'. **We recommend** Council bans public access to the Waimea Delta to protect the threatened and significant biodiversity in this area. This area is critical to the ongoing restoration of key populations and even passive recreation can damage habitat and disturb wildlife.

8.1.14 'Advertising signage'. There is no need to allow advertising within the Park. It is important that the community have outdoor recreational spaces free of advertising to allow them to fully embrace the benefits of being active in the natural environment. **We recommend** Council does not allow advertising within the Park.

*Objective 8.2: Picnicking and swimming*

We support the policies underpinning this objective but **we recommend** that Council restricts vehicle access to key nodes (as discussed below) in areas with low biodiversity values.

*Objective 8.3: Walking and running*

We support the policies underpinning this objective and in particular, **endorse** Council to advocate for dedicated, safe walking/cycling bridge access over SH60 (8.3.5).

*Objective 8.4: Biking*

We support the policies underpinning this objective and in particular, encourage Council to proactively monitor the impact of cyclists on wildlife in the Waimea Delta area, and add screening as required (8.4.3).

*Objective 8.5: Dogs*

Dog exercising within the Park is one of the key points of potential conflict between recreation and biodiversity. Allowing dogs unfettered access to all areas of the Park poses risks to biodiversity. It is particularly important that access to the river is restricted, to limit risks to the birds that live, feed and nest along the riverbank.

**We recommend** Council allows dog access to the river only in areas with low biodiversity values and only in non-nesting seasons.

**We recommend** Council bans dogs from the Waimea Delta area, as noted above, to protect the biodiversity within this area.

**We recommend** Council develop a dedicated dog park in an area with good access but low biodiversity or cultural value to allow for off-lead play. This could be modelled on the Marsden Valley park with separate areas for large and small dogs.

**We recommend** Council restricts off-lead dog walking to areas of the Park with low biodiversity values.

*Objective 8.6, 8.7: Vehicles*

The use of vehicles on anything other than formed roads within the Park poses unacceptable risks to flood management objectives, soil conservation, Park users, environmental values and cultural values. **We recommend** Council prohibits to use of vehicles off-road throughout the Park, and investigates making other, more suitable, areas available for such activities.

We endorse Council in limiting access points into the Park to prevent off-road vehicle use, and endorse the development of vehicle access to key nodes within the Park that allow access to swimming, picnicking and other recreational sites, for all the community, including those with limited mobility.

**We recommend** Council implement nighttime closure of the Park for all vehicular access, as is the case at Rabbit Island, to prevent anti-social behaviour and off-road activities.

*Objective 8.8: Horses*

We support the provision of horse riding opportunities in appropriate areas of the Park, where this does not conflict with other Park objectives.

*Objective 8.9: Aircraft*

There seems little value in allowing the use of drones within the Park, given their propensity to detract from the recreational enjoyment of other Park users and their potential impact on biodiversity, particularly birds.

**We recommend** that if Council do permit the use of drones in the Park, that they increase the buffer zones in 8.9.1.c and d to 200 m.

*Objective 8.10: Jetboats*

As with drones, there seems little value in allowing the use of jetboats within the Park, given their propensity to detract from the recreational enjoyment of other Park users and their potential impact on biodiversity. **We recommend** Council works with the Jetboating Association to find alternative venues with low biodiversity and recreational values for their slalom events.

*Objective 8.11: Gamebird hunting*

There does appear to be a conflict between providing wetland habitat that offers opportunities for both gamebird hunting and habitat for Matuku hūrepo. However, given that gamebird hunting is restricted to relatively short seasons, it appears that this activity is compatible with the objectives of the Park.

*Objective 8.12, 8.13: Fishing*

Fishing within the Park needs to be restricted to appropriate areas (and this excludes the Waimea Delta) and vehicle access must be on formed roads only. **We recommend** Council prohibits off-road access to fishing areas, in line with prohibiting all off-road vehicle access (above).

#### *Objective 8.14: Camping and overnight stays*

It is not appropriate for anyone in the community to stay overnight in the Park, whether camping or in vehicles. **We recommend** Council closes the Park overnight, as it does at Rabbit Island, and expressly prohibits camping and overnight stays.

#### Policy 9: Commercial activities

Within the relatively small area of the Park, it is likely that there will be conflict between commercial activities and the primary objectives of the Park, particularly around environmental, cultural and recreational values. However, we acknowledge that these commercial activities contribute to the flood management objective and provide valuable income for Council to reinvest in this and other Council assets.

#### *Objectives 9.1, 9.2: Gravel extraction*

We support the policies outlined in this section and the focus on ensuring gravel extraction does not negatively impact on environmental and other Park values. **We recommend** Council expedites the removal of gravel processing facilities to outside the Park (9.2.1) as rapidly as possible.

#### *Objectives 9.3, 9.4: Agriculture and horticulture*

We support the policies outlined in this section and the focus on improving environmental outcomes, such as water quality and biodiversity outcomes. We support the expectation that stock will not be permitted to access waterways and **we recommend** Council impose penalties on any leasees that allow stock to access waterways or wetlands.

We endorse 9.3.2 in particular, and support the Council in returning grazed areas back to native dominated vegetation communities. We also support the prohibition of horticulture and arable crop production within the Park.

#### *Objective 9.5: Recreation concessions*

We support the policies outlined in this section.

#### Policy 10: Infrastructure

We support the policies and objectives outlined in this section.

#### Section 13: Planning

As described above, **we recommend** Council include climate-related risk modelling in the final Park Plan.

## Section F: Actions

Te mahi hoahoa / Planning 13.1.1-7:	Include modelling of climate change risks.
2.1.4 HAIL sites:	Increase to high priority
7.1.2 River and riparian management:	Increase to high priority
8.5.2 Dog control Bylaw:	Increase to high priority
8.16, 8.17 Vehicle access closures:	Increase to high priority
8.3.5 SH60 pedestrian/bike bridge:	Increase to high priority
8.14.1 Overnight stays, camping:	Increase to high priority
9.2.1 Gravel processing:	Increase to high priority
4.1.3 Delta as Nature Reserve:	Increase to high priority
15.1.3 Encroachment:	Increase to high priority