

Date: Friday, 11 November 2022

Time: 3.00pm

Venue: Reception Lounge, Auckland Town Hall, 301-305

Queen Street, Auckland

## TŪPUNA MAUNGA O TĀMAKI MAKAURAU AUTHORITY

## HUI 80 – 11 November 2022 Open Agenda

ChairpersonMr Paul MajureyChairpersonDeputy ChairpersonCr Alf FilipainaDeputy Chairperson

Members Cr Josephine Bartley Auckland Council (Governing Body)

Toni Van Tonder Auckland Council (Devonport-Takapuna Local Board)
Chris Makoare Auckland Council (Maungakiekie-Tāmaki Local Board)
Hauāuru Rawiri Ngā Mana Whenua o Tāmaki Makaurau (Marutūāhu Rōpū)
Bernadette Papa Ngā Mana Whenua o Tāmaki Makaurau (Ngāti Whātua Rōpū)
Clay Hawke Ngā Mana Whenua o Tāmaki Makaurau (Ngāti Whātua Rōpū)
Zaelene Maxwell-Butler Ngā Mana Whenua o Tāmaki Makaurau (Waiohua-Tāmaki Rōpū)
Ngā Mana Whenua o Tāmaki Makaurau (Waiohua-Tāmaki Rōpū)

(Quorum is 7 members, comprising the chair or deputy chair and 2 members appointed by the ropū entities and 2 members appointed by Auckland Council)

## **ITEM TABLE OF CONTENTS**

- 1 Apologies
- 2 Declaration of Interest
- 3 Confirmation of Minutes
- 4 Tüpuna Maunga Integrated Management Plan Amendment 2022 Report

## Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014

## 109 Functions and powers

- (1) The Maunga Authority has the powers and functions conferred on it by or under this Act or any other enactment.
- (2) In exercising its powers and carrying out its functions in relation to the maunga, the Maunga Authority must have regard to—
- the spiritual, ancestral, cultural, customary, and historical significance of the maunga to Ngā Mana Whenua o Tāmaki Makaurau; and
- (b) section 41(2).
- (3) In exercising its powers and carrying out its functions in relation to the administered lands, the Maunga Authority must have regard to the spiritual, ancestral, cultural, customary, and historical significance of the administered lands to Ngā Mana Whenua o Tāmaki Makaurau.

## [Emphasis added]

## 41 Maunga must remain as reserves vested in trustee

- (1) This section applies to each maunga once the maunga is—
- (a) vested in the trustee under subpart 1, 2, or 3 of this Part;

and

- (b) Declared a reserve under any of sections 18 to 29, 33, and 39.
- The maunga is held by the trustee for the common benefit of Ngā Mana Whenua o Tāmaki Makaurau and the other people of Auckland.

. .

## [Emphasis added]



## Tūpuna Maunga Reserve Status\*

The following Tūpuna Maunga, with the relevant reserve status, are classified as reserves subject to the Reserves Act 1977

Maunga	Reserve Status
Matukutūruru	Historic reserve
Maungakiekie / One Tree Hill	Recreation reserve
Maungarei / Mt Wellington	Recreation reserve, Local Purpose reserve
Maungawhau / Mount Eden	Historic reserve, Recreation reserve
Maungauika / North Head	Historic reserve
Ōwairaka / Te Ahi-kā-a-Rakataura / Mount Albert	Recreation reserve
Pukewīwī / Puketāpapa / Mount Roskill	Recreation reserve
Te Kōpuke / Tītīkōpuke / Mount St John	Recreation reserve
Ōhinerau / Mount Hobson	Recreation reserve
Ōhuiarangi / Pigeon Mountain	Historic reserve, Recreation reserve, Local Purpose reserve
Ōtāhuhu / Mount Richmond	Recreation reserve
Takarunga / Mount Victoria	Recreation reserve, Local Purpose reserve
Te Tātua-a-Riukiuta / Big King	Recreation reserve
Te Ara Pueru / Te Pane-o-Mataaho / Mangere Mountain	Historic reserve, Recreation reserve, Local Purpose reserve
Rarotonga / Mount Smart	Recreation reserve

<sup>\*</sup> See sections 18-29, 33 (repealed), 39, 41, 47, 53, 54, and Schedules 1 & 2, 6 of Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014



Date: Monday, 12 September 2022

Time: 2.11pm

Venue: Online via Zoom

## TŪPUNA MAUNGA O TĀMAKI MAKAURAU AUTHORITY HUI 79 – 12 September 2022 Open Minutes

Chairperson Deputy Chairperson

Mr Paul Majurey Cr Alf Filipaina Chairperson
Deputy Chairperson

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**Members** Cr Josephine Bartley

Cr Dr Cathy Casey

Auckland Council (Governing Body)
Auckland Council (Governing Body)

Chris Makoare Bernadette Papa Clay Hawke Zaelene Maxwell-Butler

Ngā Mana Whenua o Tāmaki Makaurau (Ngāti Whātua Rōpū) Ngā Mana Whenua o Tāmaki Makaurau (Ngāti Whātua Rōpū) Ngā Mana Whenua o Tāmaki Makaurau (Waiohua-Tāmaki Rōpū)

Auckland Council (Maungakiekie-Tāmaki Local Board)

Dennis Kirkwood

Ngā Mana Whenua o Tāmaki Makaurau (Waiohua-Tāmaki Rōpū)

## **APOLOGIES**

Toni Van Tonder Hauāuru Rawiri Auckland Council (Devonport-Takapuna Local Board) Ngā Mana Whenua o Tāmaki Makaurau (Marutūāhu Rōpū)

## 1 Apologies

MOVED by Chairperson P Majurey, seconded by Cr C Casey:

That the Tūpuna Maunga Authority:

a) accept the apologies from Bernadette Papa for early departure, and Toni Van Tonder and Hauāuru Rawiri for absence.

**CARRIED** 

## 2 Declaration of Interest

MOVED by Chairperson P Majurey, seconded by Cr C Casey:

That the Tūpuna Maunga Authority:

a) note there were no declarations of interest.

**CARRIED** 

## 3 Confirmation of Minutes

MOVED by Chairperson P Majurey, seconded by Cr Casey:

That the Tūpuna Maunga Authority:

a) confirm the minutes of Hui 78 held on Monday, 15 August 2022, as a true and accurate record.

**CARRIED** 

## 4 Tūpuna Maunga Authority Term Highlights

MOVED by Cr A Filipaina, seconded by Member Papa:

That the Tūpuna Maunga Authority:

a) note the highlights over the 2019-2022 term of the Tūpuna Maunga Authority.

**CARRIED** 

## 5 Tūpuna Maunga planting update

Member B Papa retired from the meeting at 2.30pm.

MOVED by Member P Majurey, seconded by Member Maxwell-Butler:

That the Tūpuna Maunga Authority:

a) note the report.

**CARRIED** 

## 6 Secondary tracks upgrade

MOVED by Chairperson P Majurey, seconded by Cr J Bartley:

## That the Tūpuna Maunga Authority:

a) approve proceeding with the detailed design and construction of tracks across the Maunga in accordance with the plans set out in the report.

CARRIED

## 7 Draft Individual Tūpuna Maunga Plans

MOVED by Chairperson P Majurey, seconded by Member C Makoare:

## That the Tūpuna Maunga Authority:

- a) adopt the attached three Draft Individual Tūpuna Maunga Plans for public feedback.
- b) delegate to the Chair and Deputy Chair the power to make any minor amendments to the three Draft Individual Tūpuna Maunga plans prior to publication.

CARRIED

## 8 Summer Delegations 2022/23

MOVED by Chairperson P Majurey, seconded by Member Z Maxwell-Butler:

## That the Tūpuna Maunga Authority:

- a) delegate to the Manager, Tūpuna Maunga, and the Head of Co-Governance the power to carry out the mahi of the RMA Rōpū for the period from 7 December 2022 until new appointments are made to that Rōpū in the new term.
- b) delegate authority to the Filming and Events Rōpū to make decisions on all "major events" (pursuant to the delegations on Events and Filming) until 6 December 2022.
- c) delegate authority to the Manager, Tūpuna Maunga, to make decisions on all event, filming, drone use and commercial still photography applications (pursuant to the delegations on Events and Filming) for the period from 7 December 2022 until new appointments are made to that Rōpū in the new term.
- d) delegate authority to the Chair and Deputy Chair to approve any Guy Fawkes programme for 2022 to protect the maunga from fires over the Guy Fawkes 2022 period.

**CARRIED** 

## 9 Research Scholarship

MOVED by Cr C Casey, seconded by Chairperson P Majurey:

That the Tūpuna Maunga Authority:

a) approve proceeding with the allocation of the Tūpuna Maunga Authority Research Scholarship for 2022/23 as set out in the report.

**CARRIED** 

## 10 Takarunga Playcentre lease

MOVED by Chairperson P Majurey, seconded by Member D Kirkwood:

That the Tūpuna Maunga Authority:

- a) delegates to the Chair and Deputy Chair the power to execute a lease, including a Maunga Outcomes Plan, with the Takarunga Playcentre at a market rental (as determined by a registered valuer) and otherwise on the standard terms and conditions.
- b) delegates to the Chair and Deputy Chair the power to agree to terms governing the termination arrangements of the Takarunga Playcentre should the Playcentre decide not to accept the new lease.

**CARRIED** 

## 11 Registers

MOVED by Chairperson P Majurey, seconded by Deputy Chairperson Cr A Filipaina:

That the Tūpuna Maunga Authority:

a) note the attached Registers, which have been updated since Hui 78.

**CARRIED** 

Chairperson P Majurey acknowledged the mahi of the Tūpuna Maunga Authority and staff members.

Member Dennis Kirkwood closed Hui 79.

2.55pm	The Chairperson thanked members for their attendance and attention to business and declared the meeting closed.
	CONFIRMED AS A TRUE AND CORRECT RECORD AT A MEETING OF THE TŪPUNA MAUNGA O TĀMAKI MAKAURAU AUTHORITY HELD ON
	<u>DATE</u> :
	CHAIRPERSON:

## **Open Agenda**

## 1 Apologies

No apologies had been received at the close of the agenda.

## 2 Declaration of Interest

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

## 3 Confirmation of Minutes

a) **confirm** the minutes of Hui 79 held on Monday, 12 September 2022, as a true and accurate record.

## Tüpuna Maunga Integrated Management Plan Amendment 2022 Report

Authors: Dominic Wilson Manager Co-governance and Nicholas Turoa, Kaiwhakahaere Te

Waka Tairanga Whenua

Purpose	This report:
	<ul> <li>a) outlines the Proposed Tūpuna Maunga Integrated</li> <li>Management Plan Amendment 2022 process (Attachment A).</li> </ul>
	<ul> <li>b) outlines the themes covered in submissions received on the Proposed Tūpuna Maunga Integrated Management Plan Amendment 2022 and a proposed response (Attachment C).</li> </ul>
	c) presents recommendations on submissions (Attachment D).
	d) seeks approval of the recommended Tūpuna Maunga Integrated Management Plan Amendment 2022 ( <b>Attachment E)</b> .
Recommendations	That the Tūpuna Maunga Authority:
	<ul> <li>a) agree to accept the 31 late submissions received to the Proposed Tūpuna Maunga Integrated Management Plan Amendment 2022;</li> </ul>
	<ul> <li>b) agree to receive proposed recommendations in relation to submissions received which are set out in the document titled 'Proposed recommended changes to the Proposed IMP Amendment 2022' (Attachment D);</li> </ul>
	c) <b>approve</b> the tracked change version of the Proposed Tūpuna Maunga Integrated Management Plan Amendment 2022 ( <b>Attachment E)</b> ; and
	<ul> <li>d) delegate authority to the Head of Co-governance to approve any minor edits to finalise the document.</li> </ul>

## **Background**

- 1. Section 58 of the Nga Mana Whenua ō Tamaki Makaurau Collective Redress Act 2014 ("Redress Act") required the Maunga Authority to prepare and approve an Integrated Management Plan (IMP) to apply to the Tūpuna Maunga, including Maungauika; the administered lands and any land for which any other enactment requires the Maunga Authority to be the administering body. The IMP had to comply with the requirements of s59 of the Redress Act and the Reserves Act, which included a 2-month period of consultation. The Maunga Authority approved the IMP at Hui 19 on 23 June 2016.
- 2. The Tūpuna Maunga Authority adopted the Tūpuna Maunga Strategies at Hui 50 on 25 September 2019 following a 6-week period of consultation. The Tūpuna Maunga Strategies is a companion policies document that provides guidance with regards to education, biodiversity, Tūpuna Maunga design, recreation, commercial activities and monitoring. Together with the IMP, these strategies inform, guide and manage the activities undertaken on the Maunga.

- 3. To further the aims of the IMP, various capital and other projects for restoration have been carried out on the Maunga. A project planned for Ōwairaka/Te Ahi Kā a Rakataura/Mt Albert (the Ōwairaka project) has been unable to proceed due to litigation opposing the project. The Court of Appeal has ruled that, due to its significance, the Ōwairaka project needed to be included in the Integrated Management Plan (Court of Appeal decision¹). Further background on this is set out in the Hui 77 report, including copies of the Court of Appeal and High Court decisions in relation to the Ōwairaka project.
- 4. At Hui 77 (25 July 2022), the Maunga Authority considered the next steps for the Ōwairaka project and unanimously resolved (Mana Whenua and Auckland Council members) to proceed with an amendment to the IMP to specifically provide for the Ōwairaka project and restoration projects on three other Tūpuna Maunga.

## **Statutory Context**

- 5. All decisions of the Authority must take into account the legislative and policy framework.
- 6. The Authority administers the Tūpuna Maunga under the Reserves Act 1977 and pursuant to Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014. The Hauraki Gulf Marine Park Act 2000 is also applicable in relation to Maungauika.
- 7. Section 109(2) of Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 requires the Authority to have regard to the spiritual, ancestral, cultural, customary, and historical significance of the Maunga to Ngā Mana Whenua o Tāmaki Makaurau and that the Tūpuna Maunga is held in trust for Ngā Mana Whenua and the other people of Auckland.
- 8. The Tūpuna Maunga Authority's Integrated Management Plan was unanimously adopted (Mana Whenua and Auckland Council members) by the Authority pursuant to the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 and Reserves Act 1977. The Integrated Management Plan describes a series of "Values" and "Pathways" that guide all activities on the Tūpuna Maunga.
- 9. The Tūpuna Maunga Authority (Mana Whenua and Auckland Council members) unanimously adopted the Tūpuna Maunga Strategies at Hui 50 on 25 September 2020. The Tūpuna Maunga Strategies are 7 key sections that outline the strategic direction with regards to education, Biodiversity, Tūpuna Maunga design, Recreation, commercial activities and monitoring. Together with the IMP, these strategies inform guide and manage the activities undertaken on the Maunga.

## **Proposed Integrated Management Plan Amendment 2022**

- 10. The Tūpuna Maunga (ancestral maunga) of Tāmaki Makaurau are sacred to Mana Whenua as taonga tuku iho (treasures handed down the generations). They are the embodiment of their Tūpuna (ancestors). Thus, associations with Maunga are imbued with mana and wairua that occupy the spiritual as well as the terrestrial realm. The Maunga express Mana Whenua's mana and identity. The mauri (life force) of people is intimately linked to the mauri of the environment through ancestral connections. The Tūpuna Maunga are also places where Mana Whenua's ancestors lived, gave birth and died.
- 11. Following generations of Crown Treaty breaches and harm to the Tūpuna Maunga and mana whenua themselves, the return of the Tūpuna Maunga through the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 to the thirteen iwi/hapū of Auckland (Ngā Mana Whenua o Tāmaki Makaurau) was of immense significance. As observed by the TMA Chair

<sup>&</sup>lt;sup>1</sup> Norman v Tūpuna Maunga o Tāmaki Authority [2022] NZCA 30

Paul Majurey in his High Court affidavit evidence<sup>2</sup>, it meant mana whenua "were able to reconnect with our ancestors" and it marked "the start of a journey of tangibly and meaningfully reconnecting with the Tūpuna Maunga and directing providing for their care and wellbeing".

- 12. Since the vesting and the establishment of the Tūpuna Maunga Authority, a wide range of projects and programmes have been undertaken to restore the mana and the wairua of the maunga that had been detrimentally affected by actions such as quarrying, deferred maintenance, minimal pest control and limited investment into tracks and education to protect archaeological features. Many of these projects and programmes have also focused on improving facilities and opportunities for all Aucklanders and visitors from outside the region to experience and enjoy the Tūpuna Maunga and learn more about its significance to mana whenua.
- 13. From the first year of its operation in Q3 2014-2015, the Tūpuna Maunga Authority has focused on enhancing the biodiversity of the Tūpuna Maunga through pest plant and animal and weed control. This expanded into planning a broader ecological restoration programme in line with the values and pathways set out in the Integrated Management Plan.
- 14. The Proposed Tūpuna Maunga Integrated Management Plan Amendment 2022 (Proposed IMP Amendment 2022) is a new appendix (Appendix 5) that details proposed ecological restoration projects for:
  - Ōwairaka / Te Ahi-kā-a-Rakatuara / Mount Albert
  - Pukewīwī / Puketāpapa / Mount Roskill
  - Ōtāhuhu / Mount Richmond, and
  - Te Tātua-a-Riukiuta / Big King
- 15. These projects are a key step in healing the Tūpuna Maunga. The purpose is to facilitate the protection and restoration of the natural, spiritual and cultural landscape of the maunga through:
  - Planting of over 68,400 (21,980 to date) native species to increase the biodiversity, restore and sustain the landscape values, stabilise slopes, serve operational outcomes, enable cultural traditions, and create exemplar WF& Pūriri ngāhere in locations that recognise important views and the cultural landscape,
  - Removal of all pest plants in the Regional Pest Management Plan (RPMP)
  - Removal of non-native trees that negatively, or have the potential to negatively, impact cultural features of the Maunga,
  - Removal of non-native trees that block, or have the potential to block, sightlines from the Maunga to other Maunga/pā and other significant viewshafts,
  - Removal of non-native trees presenting health and safety risks,
  - Removal of non-native trees to create cultural landscapes, and
  - Ongoing pest plant, pest animal and weed control to protect new plantings, existing trees and fauna and prevent reinvasion and spread of pest plant and weed species.
  - 16. The Proposed IMP Amendment 2022 was developed in accordance with the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014, the Reserves Act 1977 and the

<sup>&</sup>lt;sup>2</sup> As outlined in the Court of Appeal decision, Norman v Tūpuna Maunga o Tāmaki Authority [2022] NZCA 30 at para 17

- Hauraki Gulf Marine Park Act 2000<sup>3</sup>. The background on the legislative requirements and approach is set out in the Hui 77 report.
- 17. At Hui 77 (25 July 2022), the Maunga Authority unanimously approved the Proposed IMP Amendment 2022.

## **Public Notification**

- 18. At Hui 77 (25 July 2022), the Maunga Authority unanimously approved the Proposed IMP Amendment 2022 and resolved to commence the statutory two-month public notification process.
- 19. The Proposed IMP Amendment 2022 was publicly notified on 3 August 2022 with the plan available for submission until 5pm, 8 October 2022. The public notice calling for submissions was widely published in national newspapers from 3 August 2022, and then with a follow-up on 3 October 2022.
- 20. Copies of the document were available for viewing at Auckland Council libraries and service centre sites and on the <a href="https://www.maunga.nz">www.maunga.nz</a> website.
- 21. Mana Whenua, the Minister of Conservation, Local Board chairs, and key interested parties, were also sent a copy of the Proposed Tūpuna Maunga IMP Amendment 2022.

## **Submissions**

- 22. The submissions period closed on 8 October 2022. In total 1,551 submissions were received on time. All submissions have been provided to the Authority members for review and have been read.
- 23. Groups from Ngā Mana Whenua that submitted were Te Rūnanga o Ngāti Whātua, Ngāti Whātua Ōrākei Trust and Te Patukirikiri.
- 24. Organisations that submitted included: Springfield Residents Association, The Tree Council, Parish of Holy Trinity Anglican Church (Otahuhu), Honour the Maunga (a group campaigning against the Maunga restoration), Te Hau Kapua/Devonport Peninsula Trust, Civic Trust Auckland, Centennial Park Protection Society Inc, New Zealand Archaeological Association, Respect Mount Richmond Ōtāhuhu community group and the Northern Car Sports Club.
- 25. Local boards that submitted included: Ōrākei Local Board, Howick Local Board, Albert-Eden Local Board, Papakura Local Board, Maungakiekie-Tamaki Local Board and Ōtara-Papatoetoe Local Board.
- 26. It is noted that 790 (nearly half) of the total submissions were sent from <a href="mailto:action@campaignnow.co.nz">action@campaignnow.co.nz</a> (which was able to be accessed from the Honour the Maunga website that was promoted via the flyer shown in **Attachment B** which included inaccurate information that was distributed to mailboxes in hard copy and through online channels). The material included a statement that the Authority proposed to remove "thousands of exotic and native trees". Management note that this is factually incorrect as the proposed restoration programme does not involve the removal of native trees.

<sup>&</sup>lt;sup>3</sup> The Tūpuna Maunga are within the catchments that support the Hauraki Gulf. The purpose of the Hauraki Gulf Marine Park Act 2000, among other matters, is to "recognise the historic, traditional, cultural, and spiritual relationship of the tangata whenua with the Hauraki Gulf".

## **Late Submissions**

- 27. There were 31 submissions received after 5pm, Saturday 8 October 2022. This included submissions from Friends of Ōwairaka and Mangere-Otahuhu Local Board. All late submissions have been provided to the Authority members for review and have been read.
- 28. Although received after the close of the submission period, these late submissions were able to be incorporated into the process and considered along with the matters raised by the other submissions. The late submitters were also invited to attend the hearing. Waiving the timeframe for the acceptance of these late submissions does not unduly prejudice the process or the other submitters to the IMP. Therefore, it is recommended that the 31 late submissions be accepted for consideration.

## **Hearing Process**

- 29. On Monday, 31 October 2022 and Friday 4 November 2022, a committee of the Tūpuna Maunga Authority comprising members Cr Bartley, Cr Filipaina, Mr Majurey, and Ms Papa. convened to hear submissions on the Proposed IMP Amendment 2022. They were supported by management who were also in attendance. Those Authority members can speak to the process and the verbal submissions made.
- 30. All persons who sought to present their submissions in-person were offered the opportunity to do so. With some persons subsequently unavailable, 103 of the 128 submitters that requested to present in-person were scheduled for the hearings. Of those 103 persons scheduled for the hearings, only 48 persons attended and spoke to their submissions. The opportunity was given to allow some submitters to present at a later time when they had missed their allocated time.
- 31. Auckland Council Democracy services staff provided advice on the hearing process. The process undertaken for the hearings was consistent with other Auckland Council processes of a similar size and met the requirements of the Reserves Act 1977.
- 32. All of the submissions have been read, as well as analysed and themes identified.

## **Themes Raised in Submissions**

33. Table 1 below summarises the responses from the total 1,582 (1,551 submissions plus 31 late submissions) submitters in relation to the Proposed Tūpuna Maunga IMP Amendment 2022.

Support	Oppose in part	Oppose in full	Neutral	Fully out of scope <sup>4</sup>
88	530	946	3	15

Table 1. Submission responses to the Proposed IMP Amendment 2022

<sup>&</sup>lt;sup>4</sup> These submissions only addressed concerns about tree removals at Tūpuna Maunga not covered by the Proposed Tūpuna Maunga IMP Amendment 2022.

- 34. While 1,476 submitters opposed tree removal, 631 noted their support for planting native species on the Maunga and 359 noted their support to fully restore the Maunga to native vegetation.
- 35. Table 2 below indicates the number of submissions (submissions plus late submissions) that covered all the Maunga within the Proposed IMP Amendment 2022, that focused solely on one Maunga and that focused only Maunga not included in the Proposed IMP Amendment 2022.
- 36. Management remind that decisions are to be made on the merits, statutory decisions are not an opinion poll.

All four Maunga included in the Amendment	Ōwairaka / Te Ahi-kā-a- Rakataura / Mount Albert	Pukewīwī / Puketāpapa / Mount Roskill	Ōtāhuhu / Mount Richmond	Te Tātua-a- Riukiuta / Big King	Only Maunga not included in the Amendment
1,445	95	3	20	1	18

Table 2. Maunga that submissions applied to

- 37. One submission raised an international agreement, the Forest and Climate Leaders' Partnership 2021. Management note that the submitter was not considering the full restoration programme that includes significant Maunga planting. Indeed, the assessments of environmental effects for the restoration programme found net ecological benefits for each Maunga.
- 38. Attachment C summarises the themes from submitters and sets out proposed responses.

## **Recommended Decision and Amendments**

- 39. Following the consideration of all submissions received to the Proposed IMP Amendment 2022 and the material presented at the Hearings, it is recommended that the Tūpuna Maunga Authority proceeds with the Proposed IMP Amendment 2022 on the basis of the recommended changes below.
- 40. The reason for that recommendation is that the Proposed IMP Amendment 2022 (as amended) meets the purposes of the Tāmaki Collective Redress Act and the Reserves Act. That includes restoring the indigenous vegetation cover of the Tūpuna Maunga which is so important to Ngā Mana Whenua for the reasons identified by Mr Majurey and Mr Turoa in the evidence referred to in the Ōwairaka decisions. Those objectives are open to the Tūpuna Maunga Authority, for the reasons explained by the High Court and Court of Appeal. It is to be recalled that the Court's did not uphold any of the challenges to the nature and methodology of the native restoration programme (for example the removal of non-native trees, the number of trees and the timing for their removal), rather as to statutory reserves process in the case of the Court of Appeal.

- 41. Following the consideration of all submissions received to the Proposed IMP Amendment 2022 and the material presented at the Hearings, the following key amendments and additions to the Proposed IMP Amendment 2022 are recommended:
  - Amend the introduction section to:
    - Clarify the purpose and scope of the programme.
    - Provide for the retention of representative mature, healthy and significant non-native trees in modified areas on the Maunga.
  - Amend the individual Maunga sections to:
    - Confirm the planting numbers are a minimum number.
    - Confirm the removal numbers are a maximum number and that not all non-natives will be removed on Ōwairaka / Mount Albert.
    - Include a section titled 'Non-Native Tree Retention' under each individual Maunga that outlines the non-native tree types to be retained as representative trees in modified areas.
    - Include mound planting as a key component of the programme on Te Tātua-a-Riukiuta / Big King.
  - Incorporate the artist impression of native restoration programme of Te Tātua a Riukiuta/Big King.
- 42. Management note that the restoration programme enabled by the IMP Amendment 2022 will be progressed alongside the annual operational plans.
- 43. The recommended changes to the Proposed IMP Amendment 2022 are set out in **Attachment D**. The tracked changes/black and white version of the IMP Amendment 2022 showing all proposed amendments and additions is also included in **Attachment E**.

## **Next Steps**

- 44. As outlined in this report, the process set out in section 41 of the Reserves Act 1977 has been followed in the development of the Proposed IMP Amendment 2022.
- 45. This has included formally notifying the Proposed IMP Amendment 2022 for submission and holding a hearing to give submitters the opportunity to speak to their submissions (refer **Attachment A**).
- 46. All submitters will be thanked for their submissions and advised of the outcome of the submission process.
- 47. Copies of the updated IMP document incorporating any amendments agreed in the approved IMP Amendment 2022 will be available through the <a href="www.maunga.nz">www.maunga.nz</a> webpage and all Auckland Council libraries will receive a copy.

## **Attachments**

Attachment A: Proposed IMP Amendment 2022 process 1

Attachment B: Honour the Maunga flyer 1 2

Attachment C: Summary of themes raised in submissions on the Proposed IMP Amendment

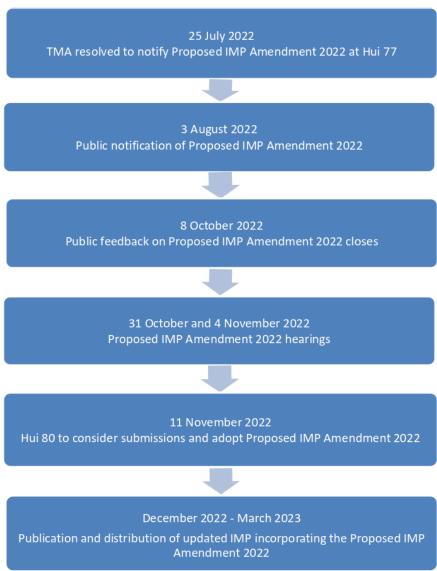
2022 with proposed responses !

Attachment D: Recommended changes to the Proposed IMP Amendment 2022 🗓 🖺

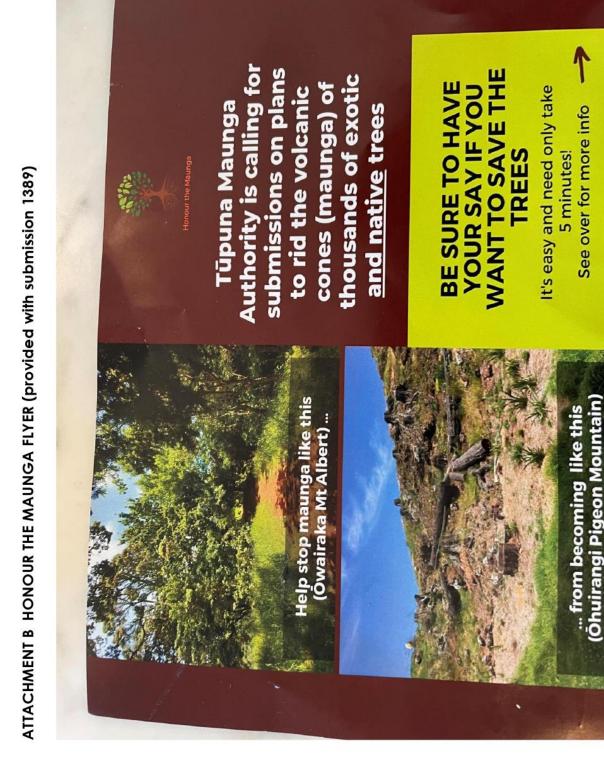
Attachment E: Proposed IMP Amendment 2022 with track changes showing recommended

changes 4





Page 1





## ATTACHMENT C

# PROPOSED IMP AMENDMENT 2022 SUBMISSION POINTS AND PROPOSED RESPONSES AND RECOMMENDATIONS

The table below groups similar submission points made in written and oral submissions. Submission points are presented in summary or extract form. Not all submission points are included; generally points in support of aspects of the draft plan are included only where others have opposed the same matter to show there are a range of views on that point.

SUBMISSION POINTS	PROPOSED RESPONSES
Approximately 23 percent of submitters supported restoration to fully native vegetation.  Submitters outlined that restoration to fully native vegetation:  - Facilitates the restoration of the natural, spiritual, and indigenous landscape of the Maunga.  - Enhances the mana and mauri of the Tūpuna Maunga and has the potential of being transformative for the whole of Auckland.  - Supports the regeneration of indigenous flora and fauna on the Maunga for the benefit of all our mokopuna and generations to come.  - Supports the biodiversity values of the Maunga and surrounding area by re-establishing the critically endangered pūriri forest ecosystem (WF7) on the Maunga.  - Supports objectives of Auckland Council's Indigenous Biodiversity Strategy; notably	Recommend no change.  The IMP describes a series of "Values" and "Pathways" that guide all activities on the Tupuna Maunga. The primary focus of the IMP is to protect the health and well-being of the Tupuna Maunga. This programme is one of the key initiatives to further the aims of the IMP.  Auckland Council's Environmental Services staff (Submitter 1500) support the restoration to fully native vegetation, noting: 'Once a distinctive feature of Auckland's volcanoes, the of puriri forest ecosystem (WF7) ecosystem type is now identified as being critically endangered in the publication Indigenous terrestrial and wetland ecosystems of Auckland. The puriri forest ecosystem variant WF7.2, characteristic of basalt volcanoes, is a rich and diverse broadleaved forest type capable of supporting a wide range of indigenous species. With careful restoration and ongoing pest management, its reestablishment will be of significant benefit to the biodiversity values of the Maunga and surrounding areas. Ecological restoration is consistent with protection and
<b>m</b>   0 ± 5 %	oiritual, na Maunga we for the ora and our ically on the

 $\overline{\phantom{a}}$ 

Objective 1: Conserve the greatest number and most divace range of unchland's indicatous accountance.	are identified as Outstanding Natural Features in the Auckland Hoiran Plan Removing trees in a way that avoids ground
aiverse range of nachana smalgenous ecosystems and sequences; and	disturbance and has minimal impact on archaeological
<ul> <li>Objective 4: Sustain and protect the mauri of natural</li> </ul>	features is supported, as this will also protect the geological
and physical resources in ways which enable provision	values of the Maunga.' They note the programme is aligned
for the social, economic and cultural wellbeing of	to Auckland Council's Indigenous Biodiversity Strategy.
Māori	New Zealand Archaeological Association Incorporated (NZAA)
One submitter noted they "Support the proposed approach	(submitter 1487) supports the intention of the Native
of providing for on-going pest control (both pest animals and	Restoration Programme to facilitate the restoration of the
plants), as this will be necessary to protect investment made	natural, spiritual and indigenous landscape of the Maunga,
in revegetation plantings. If not adequately managed, pests	including the planting of native species in locations which will
such as rabbits and climbing weeds pose a significant threat	not affect archaeological features and the removal of non-
to the vision of ecological restoration on the Maunga."	native trees which are negatively impacting the cultural
The reasons submitters opposed restoration to fully native	reatures of the Maunga.
vegetation, other than concerns raised under the tree felling	
which are addressed in detail below, include:	
- Visual amenity benefits of exotic trees.	
<ul> <li>Ecological benefits of exotic trees in terms of food</li> </ul>	
source throughout the year.	
<ul> <li>The connection exotic trees provide for people living</li> </ul>	
in Tāmaki Makaurau / Auckland's who originate from	
the trees' country of origin or who have a cultural or	
spiritual connection to the trees.	
- The potential our flora and fauna may be evolving	
towards a mixture of both native and exotic species	
as our climate changes and new pests and diseases	
come to Aotearoa / New Zealand.	
<ul> <li>The belief that areas of the Maunga are too small to</li> </ul>	
operate naturally as native only ecosystems and will	
require long term gardening using costly, high	
emission mowing and herbicides.	

	Recommend change to the bullet points under each individual Maunga section to note that the number of native plants to be planted are a minimum number as number of plants may increase if infill/enrichment planting required and if future areas for new plantings are identified.  Recommend change to Ōtāhuhu / Mount Richmond to note Pôhuehue mound planting as a key component.  Planting programme  The planting programme has followed the recommendations of expert ecologist who have recommended the plant species, sizes, spacing and planting method. Typical with any replanting programme there is a mixture of pioneer species that are there to establish a canopy with understory specimen planting (and naturally seeding species such as puriri trees) occurring once canopy has established.  Plant species are selected to support a thriving ecosystem of a more diverse range of biodiversity. The plants selected support not only a diverse range of bird species but also mokomoko/lizards, invertebrate and other plant species.  While only a few years old we are already seeing great success with many of our plantings.  Management has observed high survival rates of planting on all Maunga. Photos depicting successful planting on Māngere Mountain (Figures 1 and 2), Ōtāhuhu / Mount Richmond (Figures 3 and 4) and Ōhuiarangi / Pigeon Mountain (Figures 5	
<ul> <li>The belief that with co-governance for our population being recommended that co-planting can be considered very desirable.</li> </ul>	Approximately 39 percent of submitters supported planting native trees with many stating we need more trees to counter climate change and the loss of trees on private land and to enhance the ecology and ecosystem services of the Maunga and Tāmaki Makaurau / Auckland's biodiversity.  Submitters noted that while they would like to see a lot more planting on the Maunga, they recognise the importance of preserving historic features and how that limits how much of the area can be planted.  Submitters raised concerns about the proposed planting, with the majority of concerns focused on the proposed planting, with the majority of concerns focused on the proposed planting, with the majority of concerns focused on the proposed planting, with committers noted:  - The need for a detailed plan of the planting and care of species to be planted that has been discussed with communities of interest on site.  - Replacement plantings are mostly small, low-growing species and saplings that will take decades to look attractive, be self-sustaining, and provide food and shelter for birds.  - Non-native trees need to be replaced with native trees of a similar size.  - Current planting plans are inadequate to restore the ecological habitat if they do not replace the tree cover because they do not address all habitat niches.  - The TMA attempts to suggest that its planting plans	will 'cloak' Maunga in forests is demonstrably misleading and false. In large part, the plantings are
	Proposed planting	

of monocot species and low shrubs, with no	and 6) are included at the end of this table. Figure 6 is of the
specimen trees. Such trees that are planted are	area shown in the Honour the Maunga flyer (attachment B).
mound-planted with little to no mulch, do not follow	Management has taken a number of stens to ensure
best practice and as a result almost all die within a	management has taken a number of steps to ensure
year. In the 50-100 years that is needed for a forest	successial planting, such as planting in writer when ground
to develop, one can expect attrition rates to be well-	conditions are pest and familian linesy to give the plantings the
nigh 100% yet there are no plans for further	Where practical sites have been mulched to help retain
plantings. The density of planting also falls far very	where practical, sites have been marched to help retain
short of normal forestry practice (100,000 compared	ground moistal elevels during the summier period and reduce the need to sonly sarichemicals to manage nest plants and
to the 13,000-odd of TMA plans.) The areas planted	the need to apply agricularities to manage pest plants and
are tiny when compared to the huge size of the	weeds. Oil-going plant maintenance is scheduled post
Maunga reserves and is extremely doubtful they will	planting by planting professionals. During this time, plantings
ever come close to replacing a fraction of the canopy	are monitored for nealth and survival purposes.
lost.	The TMA has secured \$3,000,000 (plus GST if applicable) as
- The planting undertaken on other Maunga has been	part of the Jobs for Nature programme. This is a three-year
substandard and had extremely high failure rates.	conservation programme. This opportunity has established
Most of these plantings have not survived due to lack	key resources (including 13 FTEs for the next three years) for
of planting knowledge, weeding, watering and	the Authority's revegetation and pest plant and pest animal
mulching, as well as the harsh exposed conditions in	control programmes.
scoria type soil.	The time it takes for plants to grow depends on various
<ul> <li>The evidence of failure is visible to any visitor to TMA</li> </ul>	influencing factors, weather seasons, ground conditions and
plantings. The IMP Amendments could have offered	individual enociae. Generally, Management evanets that
improvements in this area of operations but do not.	within 5 years there should be visible canony cover starting to
Indeed, the Amendments perpetuate the myth that	form.
the plantings are 'maturing well' when in fact the	
attrition and mortality rate are far above acceptable,	In the past, dogs, human trampling and public vandalism have
and tantamount to negligent waste of public funds,	had some minimal impacts to the survival of plants. Fencing
and of public trust.	with clear signage is used in highly used public areas or where
- New plantings will never work in a climate	there is high dog activity to prevent people and dogs from
emergency.	walking through the planting.
<ul> <li>Consideration must be given to the location and</li> </ul>	Where low survival rates have been experienced,
nature of plantings to ensure they don't damage	management has undertaken interventions such as mulching,
archaeological features or grow to block sightlines.	replacement planting, infill planting and summer watering to

vledge and technology	increase the survival rates. Survival rates of trees are regularly
id establishment of	monitored. Infill planting is also used to add diversity species
the light soils of the	into planting sites.

There is a lack of nurserv know

reflecting on learnings, talking to experts and researching and Management has a continual improvement approach through trialling new methodologies.

Maunga restoration planting is not defined by normal forestry

practice as suggested.

# **Extent of planting**

Maunga are largely intact archaeological sites of significance and large areas of each Maunga cannot be planted without impacting intact archaeology The TMA's research policy promotes and prioritises research into methodologies or technologies that protect archeologic planting techniques that minimise impact of archaeological sites which can include research into native plantings and features.

will not have an impact on archaeological features and in the Management are actively seeking planting sites to plant that future new planting areas beyond those already identified may be able to be planted

# Replacement planting

native trees because some non-native trees are removed for archaeological impact reasons and planting cannot be done It is not always possible to replace non-native trees with without modifying these significant archaeological and cultural features.

# Pest and weed control

Restoration planting must not block sightlines as the neighboring properties will take place and emphasis Maunga were historic important look-outs when my must be on working with the community to reduce Maunga where there are so many cultural and Invasion of unwanted exotic species from native non woody species on th to deal with the production an archaeological features. this "bio trespass".

Questions were asked about:

tūpuna lived on the Maunga.

the survival rate of plants,

the time it will take for replacement plantings to

grow, and

what will happen if new plantings fail to grow.

Individual Tūpuna Maunga Plans as outlined in section 2.19 of Submitters sought maps to identify where planting will occur the Integrated Management Plan to be prepared as a matter programme for each of the Tūpuna Maunga outlined in and lists of plants to be planted and voiced a desire for of priority to better inform the proposed restoration Appendix 5.

Department of Conservation and ICOMOS to ensure that they consenting and/or archaeological authority requirements are One submitter advocated that the individual Maunga plans nighlighted early in project planning stages. The submitter should be prepared in consultation with Auckland Council follow best practice heritage management and further Heritage Unit, Heritage New Zealand Pouhere Taonga,

2

ľ		Alaunga and programmes already running around Maunga. Halo/Buffer change and programmes are aimed to prevent the reinvasion of pest	outcomes are animals and invasive weeds to the Maunga by supporting ner values. residents, business owners and schools adjacent to Maunga that the to plant native plants, control predators and suppress invasive		una Maunga.   Management are implementing halo/buffer programmes on other Maunga.	Maunga pest control contractors undertake boundary control on Maunga to manage garden escapees, pest plant incursions from neighbouring properties.	Sharing details of proposed planting	The Proposed IMP Amendment 2022 sets out key components of the proposed planting and the artist impressions indicate the future visual amenity outcomes of this planting.	The proposed planting plans are discussed at community planting days with community members/volunteers who attend.	Archaeological considerations	Management believes concerns about proceeding ahead of completing individual Maunga plans in order to ensure planting does not have a detrimental impact on archaeological and cultural features of the Tūpuna Maunga have been addressed by the involvement of qualified archaeologists in the project planning and implementation
	noted identification of archaeological evidence and values within each individual Tūpuna Maunga plan will guide	ongoing restoration and development on the M that this planning approach will ensure that arch	cultural, geological, ecological and recreational outcomes are achieved holistically without compromising other values.  More specifically, they stated that it will ensure that the	proposed programme will not have a detrimental impact on	archaeological and cultural teatures of the Tupuna Maunga.						

		The restoration planting plans were developed with an archaeologist and took into consideration the archaeological and cultural features and the type of plant species planted.
		Prior to any new plantings, Management meet on site with an archaeologist to identify where archaeological features are and distinguish modified from unmodified areas where there is intact archaeology. Any plantings planted near unmodified areas are given a buffer. Only shallow rooted species are planted in the buffer so the impact to unmodified areas is minimal to none. Shallow rooted species are those listed in the Caring for Archaeological Sites: Practical guidelines for protecting and managing archaeological sites in New Zealand (Kevin L. Jones, 2007).
		Cultural Considerations
		In some instances, native species have also been selected for their cultural uses including rongoa plantings, traditional kai sources, and plantings for weaving and carving. While there has been criticism for planting low growing "shrubs and grasses" — some of these trees have been selected for cultural reasons. There are also considerable numbers of larger trees throughout each of the planting programmes including tree species such as Karamu, Mahoe, Karaka, Puriri, Totara, Manuka, and Kahikatea. In some instances, larger specimen trees have already been planted with more to come in future years when the canopy has formed.
TREE REMOVALS		
Health and safety	There was wide support for trees that are diseased and/or unsafe to be removed, however, submitters wanted to see	Recommend minor change to para 6 on page 106 to confirm native trees won't be removed to protect the health and

management of seedlings, which can be a significant additional maintenance burden.	the Regional Pest Management Plan 2020-2030 is replaced or revoked, whichever is the earliest.
Submitters however raised the following concerns:	Refer to Management response under sub-heading 'Detail in
- Greater detail in the IMP Amendment 2022 regarding the rationale for tree removals included in the	the Proposed IMP Amendment 2022' for response to requests for greater detail.
Biosecurity Strategy section of the IMP is needed.	
- None of the trees in the 2018-2019 reports for the 4	
Maunga that are part of this proposed amendment,	
native or non-native, could have been assessed	
according to the criteria in the September 2019	
Strategies document because this was approved after	
consents were lodged.	
<ul> <li>The TMA is careless about the designation of plant</li> </ul>	
pests. In several places, TMA refers to certain trees as	
'weeds' or 'weed species' in relation to the Regional	
Pest Management Plan (RPMP) yet 'weed species' is	
not a term used in the RPMP.	
<ul> <li>Only acknowledged pest species such as Phoenix</li> </ul>	
Palms should be removed.	
<ul> <li>Some non-native trees have received an exemption</li> </ul>	
from the RPMP by Auckland Council, for example,	
Japanese cherry (Prunus serrulata) was issued an	
exemption on 1 April 2022, and should be removed	
from immediate consideration for removal. In	
relation to the cherries, submitters also noted that	
they are cultivars that do not freely seed and that	
while seeds are being produced on Ōwairaka / Mt	
Albert trees, and on Te Tātua a Riukiuta / Big King	
trees, there are no indications of germination	
occurring which is likely due to germination	
conditions not being met.	

	- The need for each and every pest tree to be evaluated by trained arborists.	
	One submitter also noted that coast banksia ( <i>Banksia</i> sp. [presumably <i>integriifolia</i> ]) is not in Treescape report for Öwairaka as a plant pest, but is now in the RPMP and that in the cost-benefit analysis for the RPMP (page 606) it has a value as: "Provides nectar for native birds.	
Protecting cultural features	Submitters supported tree removals to protect archaeological sites and/or cultural features (which was noted to also protect the geological values of the Maunga which are identified as Outstanding Natural Features in the Auckland Unitary Plan), however, the following points were made:  - More detail is required to understand which trees would be removed for this purpose and what type of vegetation would be planted to replace the trees in these areas.  - Reliance on DoC's 2007 "Caring for Archaeological Sites" needs to be reviewed especially now we are dealing with climate change, reduction of emissions and conversion to total native biodiversity.  Several submitters queried the impact of trees on archaeological features when the IMP outlines that the Maunga were extensively modified by quarrying and installation of assets such as roads and water reservoirs.	Recommend minor change to para 6 on page 106 to confirm native trees won't be removed to protect archaeological values as part of the ecological restoration programme.  While large parts of the Maunga have been significantly modified, as outlined in the IMP under section 9.6 Mana Aoturoa / Cultural and Heritage Value, they are still of exceptional significance as some of the largest and most impressive archaeological site complexes in New Zealand. The majority of the Maunga are scheduled as significant historic heritage places in the Auckland Unitary Plan.  The non-native trees are negatively impacting the cultural features of the Maunga through living root systems damaging archaeological sites and evidence. They also have the potential to damage archaeological evidence through impact damage when limb, branches and trees fall and/or by altering the terraces or other adjacent features should they be uprooted when they fail.  The programmes have been developed with a qualified archaeologist to ensure tree removals occur in a way that avoids ground disturbance and has minimal impact on archaeological features.  The Authority is in regular conversations with Auckland
		Council's Heritage Unit and Heritage NZ. Management will

		continue to work with each of those authorities (and Mana Whenua) as well as the NZAA into the future.
		Refer to Management response under sub-heading 'Detail in the Proposed IMP Amendment 2022' for response to requests for greater detail.
Protecting and restoring sightlines	Submitters supported tree removals to enhance sightlines between Maunga, however, several other submitters questioned the need because of existing viewshafts at the top of the Maunga and prominent developments such as water towers and industrial areas between the Maunga compromising cultural and historical sightlines.  One submitter requested clarification of which trees would be removed on Ōwairaka / Mount Albert for this purpose so that everybody knows what will happen in advance and so that goodwill and trust can begin to be developed.	Recommend no change.  The TMA has undertaken significant works to protect the viewshafts. This includes working with Auckland Council to clarify approaches outlined in the Unitary Plan, working with developers to ensure that the sightlines are not breached and submitting on notified consent applications.  The TMA has a policy of removing redundant infrastructure from the Maunga so while not imminent, the Authority will work with Watercare to remove water tanks from the Maunga if the possibility arises.  Refer to Management response under sub-heading 'Detail in the Proposed IMP Amendment 2022' for response to requests for greater detail.
Restoring cultural landscapes	Submitters questioned which historical point the Maunga are being returned to and raised a range of concerns, including:  - The situation is complex, and it is completely fair to acknowledge that many of the plantings over past decades weren't done with the consideration of the cultural landscape that they would have had today.  Yet to simply destroy 300 plus huge beautiful healthy trees will not suddenly return the Maunga to what it was. As with many other aspects of today's cultural landscape, the good and bad and the ugly, the clock can simply not be turned back.	Recommend no change.  The restoration of cultural landscapes is identified in the IMP and IMP Strategies.  The IMP sets out the following pathways:  Protect the tihi/crater as a significant geological and cultural landscape features from physical damage.  Preserve and enhance the authenticity and visual integrity of the Tūpuna Maunga so that they are markers in the landscape, and their cultural and natural features are visually apparent.

11

Recommend no change.	Submitters raised concerns about the ecological impacts of tree removals. The majority referred to the removal of exotic	Ecological impacts
	cultural, social, environmental and historic tapestries.  Why remove exotic trees when other pre 1850 features e.g. sportsfields, roads and toilets are being retained.  Trees should never be caught up in ideological battles.  Submitters in support noted that:  The Tūpuna Maunga are taonga tuku iho  Māori lived, gave birth and died on the Maunga so their history and culture is inextricably linked to the Maunga in ways no New Zealander of European ancestry can claim.  It is a reclamation of a more historic environment.  It rectifies the past destruction of the Maunga by a Pakeha controlled authority.  They support genuine decolonization initiatives that are led and supported by tāngata whenua.  The reindigenising of the Maunga supports native ecology and is empowering for them as an indigenous person  The Proposed IMP Amendment 2022 envisions that "Not all" non-native trees will be removed so there can still be some recognition given to European and other histories and interactions with the Maunga.	
landscape through the progressive removal of structures and features that detract from the Maunga  The Biosecurity Strategy notes under the Vegetation  Restoration section that removal of exotic trees will occur	the injustices of the past, the TMA is creating new wrongs and missing an opportunity to add to (rather than detract from) Tāmaki Makaurau Auckland's rich cultural, social, environmental and historic tapestries.  Why remove exotic trees when other pre 1850	
<ul> <li>Protect the authenticity and integrity of this unique landscape feature and respect this important</li> </ul>	<ul> <li>In attempting to correct the past with the present,</li> <li>TMA are losing the future. In its attempt to correct</li> </ul>	

Through	literatur
trees only, however, many referred to the removal of any	healthy native or exotic tree.

Submitters noted a wide range of reasons for their opposition, including beliefs that:

- The division between native and non-native trees is arbitrary, with scant foundation in science or

matauranga Māori.

There is a wide range of insects and birds living in these mature trees and that these creatures have been part of the environment for hundreds of years and depend on the trees for their safety and reproduction. Insects are also an essential ingredient in the diets of our bird species.

 The Government report Environment Aotearoa 2019\* recognised that the Auckland Region's biodiversity is in crisis.

Auckland is losing trees and green spaces at a rapid rate as it intensifies. This programme is contributing to that.

Throughout its documents, plans and reports the TMA counts one 3m tall sapling as one tree that is equal to a 150-year-old tree with a 30m diameter crown but when measured against ecosystem services a large mature tree cannot be replaced by even hundreds of stem plantings.

Clear felling is a sudden and drastic change to the

Clear felling is a sudden and drastic change to the ecosystem, it removes major ecological niches without providing alternatives. This does not allow species that currently occupy the environment to adapt. Transitioning eco-systems over time allows for species to acclimatize, adapt, or relocate.

Through a combination of site visits, review of available literature, review of past vegetation on this site, and site reports relating to threatened species, consultant ecologists established the ecological values of the Maunga overall and this was used to assess the impacts on these ecological values from the tree removal, and to ensure impacts sensitive flora and fauna and avoided or suitably mitigated. Furthermore, a herpetologist confirmed that the overall herpetological values of the Maunga will be increased subject through the programme if recommendations are included – which they were.

The resource consent decision for Ōtāhuhu / Mount Richmond (LUC60384274) outlines under reasons that 'ecological effects arising from the proposal can be appropriately managed as part of the works programme and will in time be at least remedied if not enhanced by the revegetation initiative. The resource consent for Ōwairaka / Mount Albert (LUC60328646) and Pukewīwī / Puketāpapa / Mt Roskill (LUC60347931) outlines under reasons that 'Ecological effects arising from the proposal can be appropriately managed as part of the works programme to ensure that any adverse effects are less than minor.'

# Food and habitat availability for birds

Exotic trees can provide habitat and food resources for native birds and other fauna. Tall trees can be utilised by birds as a means of avoiding predators while roosting, and because they provide elevated observation points for hunting and asserting territorial dominance. Banksias, and some wattles and eucalypts, are winter-flowering plants and attract nectarfeeding birds, especially tui (Bergquist, 1987). Campbell et al (2008) found that introduced plants can be important food sources to kereru in human-modified landscapes, due to the

13

One of the reasons for the removal of pest plants and weeds is to prevent spread of these species on the Maunga which

landscapes and native vegetation. Moreton Bay Figs' seeds are for example bird dispersed and seedlings usually start as

may impact archaeological sites, sightlines, cultural

Result in a massive loss of biodiversity caused by

mulching.

dispersal by trees and birds.

Immediately stop pollination and natural seed

<ul> <li>Trees are also an essential ingredient in the water</li> </ul>	greater availability of exotics relative to native
cycle. Rain is absorbed by the trees and released back	species. However, banksias and wattles seed freely and are
into the air through transpiration.	invasive in open sites (as an indication of this, both have
- Court papers show that no research was undertaken	established throughout existing plantings on
into the holistic effects such as how the cumulative	Owairaka). Mature trees are not necessarily the predominant
loss of thousands of trees across Auckland would	food source for frugivorous or nectar-feeding native
affect ecology.	birds. Campbell et al (2008) found that the foliage and flowers
Thore is no anidones that the Authority has ever	of broom and tree lucerne (two weedy leguminous shrubs)
considered more afficient and affective	formed a large component of kereru diet on Banks Peninsula
methodologies to manage trees that do not lead to	(along with kowhai, willow and some pohuehue) during winter
the chort and medium term negative concerniones	and spring when fruit availability was low, while shrubs and
to the relient biodiversity currently living on the	small trees (poroporo, mahoe and ngaio) were important
office of Manage	during summer and autumn (along with domestic fruit
מוופרופת ואומתוופמ.	trees). In a Nelson study, Williams and Karl (1996) observed
The alleged general impacts of the tree removals that	that endemic birds (tui, bellbird) showed a strong preference
submitters highlighted included that they will:	for indigenous fruits, especially karamu, and five-finger to a
- Change the Maunga's own momentum and natural	lesser extent (totara was also a key food source). Studies of
balance.	habitat usage by native birds on Tiritiri Matangi Island (Graham
- Negatively impact vertebrates (e.g. hirds lizards) and	et al 2013) found that all bird species readily utilised young
invertebrates (e.g. insects) as well as lichens and	revegetation plantings for foraging and nesting as the habitat
symbiotic fungi as the trees provide habitat, shelter	developed, to the extent that birds were more abundant in
and food source and other environmental services	replanted habitat in than forest remnants in the latter interval
such as soil stabilisation and water retention. This	of the study, 20 – 25 years after planting commenced. Hax and
was often highlighted to be increasingly important	karo were noted as important nectar sources on the island,
because climate change is resulting in more severe	along with pohutukawa.
weather.	Preventing further spread of exotic trees and pest plant and
- Likely displace native species relying on the mature	weed species
trees.	

Result in a loss of leaf litter that protects roots,	epiphytes (so d
to the soll and furtures the aeration of soll by invertebrates such as earthworms.	Impacts on oth

specifically to, the following claims were often reiterated: In relation to birdlife, which many submitters referred

- Birds are kaitiaki of the Maunga and deserve proper
- promote the repopulation of native bird species in Every mature tree within the Tūpuna Maunga Authority jurisdictions is helping to foster and the wider urban context of the city. consideration of their wellbeing.
- Native birds do not care if the food/shelter is native or non-native.
  - Our native birds will go hungry if all the non-native support the large number of birds currently there. nectar as well as berries. This often fills gaps when Exotics, such as banksias, often provide abundant native food for birds is unavailable or unable to trees are removed.
    - Kākā (cavity nesters) have been seen on Mount
- The tree removals on other Maunga have resulted Ōtāhuhu / Mount Richmond and Te Ara Pueru / Te in the displacement of birds, with moreporks on Pane-o-Mataaho / Māngere Mountain being not heard or seen since the removals.

removals on monarch butterflies that overwinter in mature trees and which are identified as threatened by the IUCN. One submitter raised concerns about impacts of tree

Many submitters referenced the impacts of the "ecological restoration" or clear-felling of large numbers of mature on

ney can overwhelm and kill the supporting tree. difficult to detect until well-established) and as

## ner Maunga

As noted in the response under the 'Proposed planting' subheading, the planting on the Maunga is actually very successful.

at the tihi and a significant drought that summer, there was a This included pinning pottles to the ground rather than planting. These plants were monitored and the pottles have archaeological fabric of the Maunga has had reasonable success and management continue to adapt the methodology to improve survival rates. Due to the exposed nature of the site lower survival rate than normal which was consistent with what period. Additional plantings, including infill plantings, will be undertaken after the track development which was completed was happening elsewhere around the region during that Mangere Mountain were planted using a no-dig methodology. Plants at the tihi of Te Ara Pueru / Te Pane-o-Mataaho been removed when it is deemed appropriate to do so. cultural innovative method which protects the earlier this year.

## Alignment with Council's plans

Auckland Council's Indigenous Biodiversity Strategy; notably The Proposed IMP Amendment 2022 supports objectives of

- Objective 1: Conserve the greatest number and most diverse range of Auckland's indigenous ecosystems and sequences; and
- and physical resources in ways which enable provision Objective 4: Sustain and protect the mauri of natural

Recommend no change.	Submitters raised concerns about the tree removals on climate change and global warming primarily because submitters noted the mature trees help absorb carbon in a	Carbon sequestration/ climate change impacts
	A submitter in support of the tree removals noted that the vast majority of the exotic trees hold little or low value to the environment and their removal will support native regeneration of indigenous flora and fauna for the benefit of all of our mokopuna and generations to come. Another submitter in support of tree felling and significant replanting on Ōwairaka / Mount Albert noted that together with a community anit-predator programme, this could enable an amazing return of birdlife to the Maunga.	
	Maunga IMP Amendment 2022 conflicts with Auckland Council's plans and policies to nurture and grow Auckland's urban ngahere.	
manage vegetation on significant archaeological or culturally	Several submitters also alleged that the proposed Tūpuna	
document. It also does not go into any detail as to how to	Banksia.	
It is noted that the Urban Ngāhere Strategy is a non-statutory	noting examples of at-risk trees including the Macrocarpa and	
Access for all residents	raises concerns regarding a lack of understanding of the current ecosystems present on Ōwairaka / Mount Albert,	
<ul> <li>Create ecological corridors and connections</li> </ul>	and un-nuanced classification of exotic trees to be removed	
Ensure urban forest diversity	Many submitters raised concerns about the impacts of removals at specific Maunga. One submitter noted the broad	
<ul> <li>Preference for native species</li> </ul>	term.	
<ul> <li>The right tree in the right place</li> </ul>	habitat and ecosystem services in the short and medium	
oti ategy iiotabiy.	and methodologies are inadequate to restore the ecological	
Success factors in the Auchianus of Dair Ngailere (Forest)  Ctratagor notabliv	submitters felt this demonstrated that the replanting plans	
success factors in the Auckland's Hrhan Nashers (Forest)	destroyed and the biodiversity habitat devastated. These	
The proposed IMD amondment cumparts principles and	where they believe the tree canopies have been substantially	
Māori	Te Ara Pueru / Te Pane-o-Mataaho / Mangere Mountain	
for the social, economic and cultural wellbeing of	Ohuirangi / Pigeon Mountain, Maungarei / Mt Wellington and	

way that the proposed replanting could not for many decades | Compareplace because of the composition and scale of the plantings | a compand the length of time the plantings will take to mature.

One submitter noted the that while eventually reaching a plateau, larger trees store significantly more carbon than smaller trees as fifty percent of the biomass of the stems, branches, roots, and foliage of trees is made up of carbon absorbed from the atmosphere and provided the following source for this information

https://www.treesthatcount.co.nz/media/1097/ttc-carbonsequestration.pdf. Other points raised in relation to climate change and carbon sequestration include claims that:

- Exotic trees absorb more carbon than native trees
- There is no consideration of the carbon release consequences of clear-felling, nor the release caused by mulching large numbers of trees.
- The best soils contain about 2% carbon. Trees contribute to the purification of soil by shedding their leaves which then decompose, contributing minerals to the soil. Through their roots trees pull nutrients from underground, once again improving our soil. It is wrong that the Council is using ratenasors? finds
  - It is wrong that the Council is using ratepayers' funds via the Tūpuna Maunga o Tāmaki
    Makaurau Authority to remove trees when we now understand the important role they play in carbon sequestration this applies, in particular, to large
- The IMP doesn't reference climate change anywhere in the document.
- The proposed Tūpuna Maunga IMP Amendment 2022 conflicts with Auckland Council's climate emergency

varied; for example, initial and long-term growth and biomass grow large, form dense wood, live for a long time, and have litter that accumulates on the forest floor are a good choice for long term carbon sequestration, and this category includes many native trees (e.g., karaka, totara, kohekohe etc). Fastinitially<sup>4</sup> but have a shorter lifespan than native trees (typically less than a hundred years), while growth rate and productivity declines prior to this (Ogden et al 1997). Early-successional plantings of shrubby hardwoods have a very rapid uptake of carbon, but plateau at 20 – 30 years, as rates for longer-lived native trees begin to increase<sup>4</sup>. Essentially, the greater overall density of plantings proposed for the Maunga relative to the losses. Some woody material from felled trees can be used as mulch or woody debris for invertebrate and lizard habitat a complex matter, as factors to be considered are many and against one another. Nevertheless, in simple terms, trees that growing exotic species such as pines sequester more carbon number of trees to be removed will more than offset carbon decomposition rate once dead, leaf litter type and likely root / soil biomass are all relevant factors that may be "traded off" Comparison of carbon sequestration rates between species accumulation rates, longevity of each species enrichment.

In relation to the submission on the Forest and Climate Leaders' Partnership 2021, Management note that the submitter was not considering the full restoration programme that includes significant Maunga planting. Indeed, the assessments of environmental effects for the restoration programme found net ecological benefits for each Maunga.

	Recommend following changes:  - Change to the bullet points under each individual Maunga section to note that the number of nonnative trees for removal are a maximum number.  - Make provision for retention of representative mature, healthy and significant non-native trees in modified areas of the Maunga, with tree types specified under individual Maunga sections and tree removal number confirmed as a maximum number.  As part of the process of assessing each of the restoration projects a landscape and visual assessment has taken place for each of the proposals for the projects. For each of the proposed projects the visual impacts have been assessed as low to moderate.
declaration and its plans and policies to reduce carbon emissions.  One submitter believes that the tree removals are in conflict with the United Nations Forest and Climate Leaders' Partnership 2021 which sets out that the signatories (of which New Zealand is one) will work collaboratively to halt and revers forest loss and land degradation by 2030 and strengthen shared efforts to conserve forests and other terrestrial ecosystems and accelerate their restoration.  Submitters that supported tree removals noted that climate change impacts are negligible whereas planting thoughts of new trees will have significant benefits. It was also noted that opponents would be better placed to fight the removal of provisions in the Resource Management Act that protected large trees as this has resulted in the removal of trees without any plans for their replacement.	Submitters raised concerns about the impacts of tree removals on the amenity and visual amenity of the Maunga. Submitters noted visual amenity benefits of exotic trees, including: visual interest, colour, scale, signalling of the change of seasons and beauty.  One submitter requested that the holm oaks on the southwest side of the Ōwairaka be retained at a minimum becasue they are very large trees that are lovely in anyone's language and which blend in beautfiully with the pōhutukawas in the surrounds.  One submitter highlighted that the trees have outlived many residents and changed community perceptions regarding the well-being of natural assets within the local confines of
	Visual amenity and amenity impacts

subdivided suburbia, including the aesthetic relief of	In the short to mid-term there may be some low effects
Ōwairaka / Mount Albert.	however this is balanced out by the positive effects of th
Submitters noted that seeing tree stumps and barren	project.

he

create visual connections with the terraces and archaeological It is important to understand that one of the objectives is to features which will be accentuated by the removal of nonnative trees that hide these important taonga.

Furthermore, over time the extensive plantings on each of the Maunga will provide positive visual effects.

retention of representative specimen trees while healthy will It is recognised that there are some non-native trees which some people value for their visual amenity value. Where these are located on modified areas of the Maunga, the recognise this. The Native Restoration Programme will in Management's view accordance with spiritual, ancestral, cultural, customary, and enhance the amenity of the Maunga for all visitors in in historical significance of the Maunga.

can be conserved and equally contribute to the better use and tethered to the existing state and nature of the vegetation on the Maunga and must be able to embrace revegetation which natural environment. In this way the qualities of the reserve NZCA30) judgement in paragraph 159 '..the approach to the It is also noted that the Court of Appeal (CA21/2021 [2022] qualities of the reserve' referred to in s 17(2)(c) cannot be itself contributes to a pleasant, harmonious and cohesive enjoyment of the reserve'.

trees are located on unmodified slopes that are not regularly removal of some of the non-native trees (noting that some There will be some minor shade amenity effects from the

Submitters also outlined that the removals will significantly impact their enjoyment of the Maunga by:

and will be upsetting. The purpose of leaving the stumps was

questioned

landscape as has been witnessed on other Maunga has been

removing opportunities for recreation such as tree

climbing, exploration and picnicking under trees, and which bring them a sense of peace and tranquillity removing trees which they find life affirming and and a feeling of delight and respite.

negatively impact shade and shelter provision for visitors and consequently this would negatively impact their experience Submitters noted the removal of exotic trees would on the Maunga.

achieved without ruining the experience for years and for Some submitters noted that any transition should be generations in the interim

## Specific trees referenced for their visual amenity and amenity benefits were:

Ōwairaka / Te Ahi-kā-a-Rakatuara / Mount Albert

- Japanese cherry trees (Prunus serrulata) because they provide visual amenity and food source.
- Holm oaks (Quercus ilex) on the south-western side large trees that are lovely in anyone's language and of the Maunga which one submitter noted are very

traversed). However, the native trees located along tracks and in amenity areas will continue to provide shade cover.  On projects to date the shade and shelter effects have has been minimal. For example on Te Ara Pueru / Te Pane-o-Mataaho / Mangere Mountain there remains significant tree cover along the main walking route.	On all Maunga there will remain significant tree cover by way of remaining native trees. Many of which are located on existing tracks or near existing amenity areas.	Recommend no change.  Management has taken considerable steps to manage the risks of erosion. This includes regular conversations with the Auckland Council Geotechnical engineers and regular inspections and assessments. Geotechnical engineers assessed the risks against our project plans and have not highlighted significant risks with the proposed projects.  A geotechnical survey of Te Pane a Mataoho/ Te Ara Püeru/ Mängere Mountain was conducted by Auckland Council Geotech engineers in 2019 after the removal of the non-native trees. The engineers concluded there is minimal risk of erosion at the tihi from tree loss.  It is noted by Management that the impacts of off trail walking and desire lines is a significant cause of erosion on the Maunga.  Desire lines and associated water scouring has led to erosion.
blend in beautifully with the pōhutukawas in the surrounds.  Mix of eucalyptus which one submitter noted are magisterial and so tall that they would not block the line of sight to Ōwairaka from other Maunga in Tāmaki Makaurau.	Pukewīwī / Puketāpapa / Mt Roskill  - The Phoenix Palms, Norfolk Pines and other large non-native trees which one submitter noted have been part of the mana of this Maunga for decades.  Otāhuhu / Mount Richmond  - The grove of mature Morton Bay Fig trees because they provide the walker a moment of calm before the track opens up again to its view of factories.	Submitters raised concerns about soil stability and erosion impacts of exotic tree removals.  Submitters outlined their views that:  - The Maunga environments are harsh - being exposed to the elements - and have thin, almost non-existent topsoil.  - What soil there is on the Maunga has been created by the existing trees and is kept there by them and their roots.  - The trees and their inherent root systems are natural stabilisers of the land, particularly poorly consolidated volcanic slopes consisting of ash, scoria, and basalt lava formed by the explosive fragmentation of magma and/or existing solid rock during the pyroclastic volcanic eruptions of Öwairaka
		Soil stability and erosion impacts

/ Mount Albert. Although vegetation does add	This has been the case at the tihi of Te Pane a Mataoho / Te Ara
weight to a volcanic slope, its net effect is to	Pūeru / Māngere Mountain where erosion was noticed prior to
generally stabilise slopes. Plant roots, especially those	the tree removals. Recent track upgrades and signage asking
of trees provide a strong interlocking network to hold	people to stick to the track have been successful in slowing
unconsolidated materials together and prevent flow.	down erosion on Te Pane a Mataoho / Te Ara Pūeru / Māngere
In addition, vegetation takes up moisture from the	Mountain and Maungawhau / Mount Eden.
upper layers of soil and can thus reduce the overall	
moisture content of the mass, increasing its shear	
strength. Moisture loss through existing vegetation,	
including the trees now standing, by transpiration	
also helps to dry out sodden soil more quickly.	
- The tree canopy protects the rock/soil from exposure	
to strong winds and heavy rainfalls.	
<ul> <li>The building up of the current environment has taken</li> </ul>	
at least 100 years and, under current climate change,	
may never be achievable again.	
- The current ecological equilibrium would be	
destroyed by unnatural defilement involving the	
felling of present trees.	
- Re-direction of subsurface water drainage and weight	
relief by the loss of trees/vegetation can cause not	
only earthquakes but landslides too.	
Submitters outlined their beliefs clear-felling will destroy	
the current ecological equilibrium and lead to rock/soil	
disintegration and destabilisation (chemical weathering,	
mechanical weathering, erosion, slips (mass traveling as a	
unit), slumps (mass moving in an incoherent jumbled mass	
flowing almost with the characteristics of a fluid) and	
mudflow (viscous tongues of mixed mud, soil/ash, rock and	
water).	
Submitters highlighted that this will in turn lead to:	

	Recommend no change. It is noted that the new plantings on the Maunga and remaining native plantings will also play a role in water retention and storm water runoff.
<ul> <li>Damage to adjoining properties and potential lawsuits.</li> <li>Costs to undertake remedial action and warn people of hazards.</li> <li>Sedimentation of water ways which will negatively impact our harbours.</li> <li>The removal of soil for new plantings to grow in.</li> <li>Many submitters referred to these impacts becoming an increasingly important consideration with climate change, with one submitter noting recent weather has shown that there is a destabilising effect from clear felling / impacting the root structure.</li> <li>With specific referent to Ōwairaka / Mount Albert, one submitter highlighted that 'Artificial reservoirs may change their character upon landscape change. As the reservoir fills, pore pressures in rock along the sides of the reservoir increase, and the strength of the rocks to resist shearing stress can be correspondingly decreased. Water reservoir levels also alternate displacement weight and if surface landform changes, that can effectively cause surrounding land to slow "creep" inducing significant instability, often incurring serious property damage once started. To not rid Ōwairaka / Mount Albert of existing trees would better protect nearby houses and municipal water reservoir on the steeply sloping flanks of the volcano presently built in potentially dangerous places where natural movements cannot be controlled.</li> </ul>	Many submitters noted the role exotic large trees play in water retention and stormwater runoff management and that their removals will exacerbate runoff, flooding, and sedimentation of waterways, reduce soil moisture and negatively impact aquifers.
	Water retention and runoff impacts

Kikuyu grass and other non woody n <b>on-native</b> ground covers	Many of the submitters from action@campgainnow.co.nz noted that it is ironic that the TMA's stance against exotics will result in exotic invasive kikuyu taking over. Submitters also raised concerns about the fire risk kikuyu grass presented and the long-term sustainability, costs, and environmental impacts of the current approaches – mowing, weed eating and herbicides - to managing kikuyu grass and other exotic non woody ground covers such as European gorse (Ulex europaeus) and white flowered blackberry bramble (Rubus fructicosus).  One submitter noted that the understory covers more than grasses and in the methodology sections that state "Retaining the tihi in grass and native species" the term "non woody species" should be used. The submitter also recommended adding "Kikuyu will be controlled with a renewed series of trials in areas shown on plans to show the public environmental methods to replace with non woody exotic species with native species." This will also meet policies elsewhere in the IMP regarding the control of kikuyu	Recommend no change.  Pest plant management is undertaken across the Tūpuna Maunga network seasonally throughout the year; typically, in the spring, summer and autumn months the teams are out daily.  The Jobs for Nature funding will enable an increased focus on pest, weed and kikuyu grass control.  In line with the IMP, Management intends to continue to explore management options that will enable a phased reduction in the use of herbicides and pesticides and resource intensive manual control options.  Refer to response under sub-heading 'Proposed planting' regarding inclusion of Pōhuehue Mound Planting which is in part to respond to kikuyu grass impacts.
Fire risk impacts	Submitters raised concerns about increased fire risk, with this generally being linked to kikuyu grass invading areas where trees are removed.  One submitter asserted that failed plantings created a fire hazard, which led to two of the deforested Maunga having fires that threatened nearby houses.  A submitter in support of the tree removals noted that some trees, such as the Eucalyptus trees, are a dangerous source of fire.	Recommend no change.  Management have taken steps from the very beginning of operation to manage fire risk on the Maunga to protect the Maunga and neighbouring properties. This includes extensive firebreaks at critical areas of the Maunga (for example adjacent to buildings), regular catch ups with FENZ who audit our processes, closure of the Maunga during the Guy Fawkes season and operational protocols for contractors when operating during the fire season.

There have been no fires associated with any of the planted areas. All fires have been attributed to illegal fireworks and arson caused on the Maunga. Management is working to reduce these risks and there have been no fires on the Maunga during the Guy Fawkes period since the closures were instituted	Recommend no change.  It is noted that the plantings on the Maunga will also play a role in removing pollutants and carbon dioxide and providing oxygen.  It is also noted that the wider work programme has seen the removal of vehicles from tihi of the Maunga and improving the air quality from the tihi of the Maunga.	Recommend no change.  The TMA notes the significance of the Maunga to Aucklanders and the aroha they have for the Maunga. They understand the value people place on them as places for quiet reflection and respite, connection, and recreation.  The TMA has taken a number of actions to enhance the visitor experience and the community's connection to the Maunga and their understanding of the spiritual, ancestral, cultural, customary and historical significance of the Maunga to Mana Whenua.  This has included improved maintenance, stopping vehicle access to the tihi, track improvements, the provision of other in recreational opportunities such as play, the facilitation of in leases and events and volunteering opportunities.
	Submitters noted that exotic trees provide improved air quality by removing pollutants and carbon dioxide and providing oxygen. Concerns were raised that felling 'air-purifying trees' contravenes Auckland Council's recently approved emission reduction plan.	Submitters highlighted that the proposed tree removals would have wellbeing impacts, that they would find the removals very upsetting and distressing and/or that it would negatively impact their connection to nature. Submitters' comments in relation to these impacts included:  - People have spiritual and/or deep personal connections to the Maunga, the trees and the wildlife they support People that have grown up close to the Maunga have their own histories. No one has the right to extinguish that history There are significant physical and mental wellbeing benefits of visiting the Maunga particularly in a highly industralised area like Ōtāhuhu / Mount Richmond, in an increasingly developed urban landscape and/or in lower socio economic areas like Ōtāhuhu where it is hard for its residents to travel.
	Air quality impacts	Wellbeing impacts

Hundreds of people have been involved in the native restoration programme and we are seeing a growing number of people involved in the native restoration programme adding to their wellbeing.  While there will be some short-term minor impacts such as disruption to access and visual amenity impacts, the ecological restoration programme will create an environment that supports community wellbeing. Visitors will experience thriving indigenous biodiversity and the other many benefits of healing the Maunga, the ancestral mountains for Tāmaki Makaurau's iwi/hapu. As noted in the Court of Appeal judgement (CA21/2021 [2022] NZCA30) in paragraph 157, 'Everyone benefits from the implementation of legislative measures designed to provide redress for historical breaches of the Treaty.'  n d the len a	The TMA has an education strategy to help grow understanding of the cultural landscape and the importance of maintaining heritage and archaeological sites alongside the benefits of native restoration projects.
<ul> <li>The felling is disrespectful to trees and other lifeforms.</li> <li>Seeing what happened to the trees at Ōhuirangi Pigeon Mountain, Maungarei Mt Wellington and Te Pane o Mataoho Mangere Mountain was very upsetting and I would not like to see that happen anywhere else.</li> <li>This issue has been divisive, taking the wairua, mana, and mauri from each of us.</li> <li>If the Amendment in its current form went ahead, many people would be deterred from going up the Maunga because the proposal's effects would become another spiritual scar on the mountain that would overpower the enjoyment from going there.</li> <li>A submitter in support of the Proposed IMP Amendment 2022 outlined their belief that while work commences on projects the initial negative impacts are front of mind and the approval for the ultimate vision is forgotten. But that when a successful plan is finalised and people can enjoy the improvements and see the benefits, the pain is forgotten. The submitter believes this will be the case for this native restoration programme.</li> </ul>	Many of the submitters from action@campgainnow.co.nz raised concerns about what children will learn about environmental stewardship when they witness the tree removals.  One submitter also noted that the trees currently thriving on Ōwairaka / Mount Albert still enthrall and have much to teach.
	Environmental stewardship impacts

It is noted that there are no scheduled trees on any of the Maunga however Management recommend the following changes:	<ul> <li>Amend paragraph 1 on page 106 to note trees weren't randomly planted.</li> <li>Change to the bullet points under each individual Maunga section to note that the number of nonnative trees for removal are a maximum number.</li> <li>Making provision for retention of representative mature, healthy and significant non-native trees in modified areas of the Maunga, with tree types specified under individual Maunga sections and tree removal number confirmed as a maximum number.</li> <li>It is acknowledged that there are Aucklanders who seek retention of trees they believe have historical or heritage value. As there are Mana Whenua who strongly support the overall native restoration programme. The proposed amendment will enable this to be investigated further and for selected representative trees to be retained.</li> <li>This aligns with the "recognise European and other histories and interaction with the Maunga" pathway in the IMP under the Mana Aotūroa/Cultural and Heritage Value.</li> </ul>
Submitters noted that exotic trees have significant heritage and historical value to local people and/or that they are part of our shared heritage. Submitters noted that:	<ul> <li>Auckland is a multinational city. We have welcomed many races. The immigrants planted these trees. They are also part of the history of the city.</li> <li>The trees are vital to fully appreciate the history and legacy of the early settlers, they are part of our New Zealand history and must not be destroyed.</li> <li>The trees represent a historic connection to our forebears and their removal would be an insult to their memories.</li> <li>There is a lack of recognition of European and other histories and interactions with the Maunga.</li> <li>There is evidence that many of the trees were planted in accordance with plans rather than randomly planted as suggested in the IMP Amendment e.g. cherry trees on Owairaka / Mount Albert's regular spacing and similar height and crown coverage indicates they were planted intentionally rather than self-seeded.</li> <li>The desire to reindigenise or decolonise the Maunga and is not sufficient justification to fell mature healthy trees.</li> <li>One submitter advocated that any memorial tree planting on the Maunga should be managed with the Tūpuna Maunga Memorials and Plaques Policy which stated that the Authority will consider any pre-August 2014 memorials and plaques on a case-by-case basis and in discussion with the Tūpuna</li> </ul>
Loss of trees that have historical or heritage value	

	Another submitter noted the importance of preparing individual Maunga plans to ensure exotic plantings that may also have heritage value are not inadvertently affected or removed.	
	Specific trees referenced for the heritage value:	
	<u> Ōwairaka / Mount Albert:</u>	
	- The olive grove planted with seeds sent home by Jack Turner from Palestine during World War II which Jack's family planted in honour and memory of him, not then knowing whether he lived	
Tree removal	Submitters raised concerns about the impacts of clear-felling	Recommend no change.
metnodology	mature trees (particularly if nealithy and hon-invasive). Many advocated instead for a more gradual and gentle approach over several decades so that nature and the community can	The methodology for removals is not the focus of the Proposed IMP Amendment 2022. The methodology is an
	adapt. The approach submitters advocated included:	operational decision as was reinforced through the Court of Appeal decision (CA21/2021 [2022] NZCA30].
	<ul> <li>Prioritising the removal of trees that are identified pest plants in the RPMP, that threaten the physical</li> </ul>	Management determined the implementation approach
	integrity of archaeological sites and/or that are a	unrougn a detailed, collaborative and iterative process with tree removal methodology experts, ecology experts, an expert
	Underplanting the existing canopy with native	in landscape architecture, an expert archaeologies and expert resource management planners.
	species, - Planting other suitable areas with native species.	It is noted that Auckland Council's Environmental Services
		staff (Submitter 1500) outline that 'While ecological
	reached an appropriate stage of maturity, and/or	restoration planting may be carried out successfully under
	- Removing trees only when they are diseased or reach	exotic vegetation in some circumstances, the approach
	the end of their natural life and become a health and	proposed here of removing exotic species first is supported.
	safety concern as assessed by an independent	This avoids the damage to plantings that would be caused by
	qualified arborist.	the need to remove exotic species in future for arboriculture
	Submission points in support of a staged approach were:	and health and safety reasons. If old trees were retained, their removal is likely to be necessary eventually, as large old trees

deteriorate and falling branches pose a danger to visitors in	er   such well-used reserves as the Maunga. The removal of exotic	species is also consistent with the ecological objective to	restore indigenous vegetation to the Maunga		It is also noted that the new plantings are thriving without a	tochopy cover, that intalligement use a wide range of	recilinques to manage pest plant and weed invasion and that	new prantings are generally expected to have achieved	callopy cover within the years of planting.		+	e l							th								u u					
- It recognises that the ecologies of various Maunga	represent complex interrelationships developed over	many decades and gives the ecosystem (and	particularly the fauna) a chance to adapt.	- It respects the natural cycles of te taiao - working	with its timeframe rather than imposing our own-	and will also be sympathetic to the	interconnectedness and complexity of the	ecosystems of our Maunga.	<ul> <li>It utilises the current mixed overstory of native and</li> </ul>	non-native trees to provide shade, soil stability, soil	water retention and a microclimate that will support	restoration planting and lead to higher survival of the	new plantings and the self-seeded natives already	growing under the canopy. The importance of this	has been highlighted by the high failure rates of	plantings on other Maunga.	- Examples such as Maungawhau / Mt Eden and	Craigavon Park were referenced to highlight the	success of programmes involving under-planting with	native seedlings and replacement planting at the	natural end of the exotic tree's life.	<ul> <li>Climate change will make it increasingly difficult to</li> </ul>	establish new plantings without the habitat and	shelter provided by the existing mature trees.	<ul> <li>It reduces the risk of invasive weed species such as</li> </ul>	kikuyu grass, gorse and blackberry invading the	Maunga and requiring extensive chemical application	as have been observed where tree removals have	already occurred.	<ul> <li>Nature is already transitioning with evidence of</li> </ul>	native trees self-seeding and flourishing under the	protective canopy of the existing trees.

It avoids a cyastating what is an actinicating actions.	<ul> <li>It avoids a forigint period, at least 10 pius years, inptil new plantings mature enabling the Mainga to</li> </ul>	continue to be enjoyed as they are by everyone for	the duration of the programme.	<ul> <li>It reduces the costs of the programme by avoiding</li> </ul>	expensive tree removals and retaining self-seeded	natives and reducing the need for regular watering,	replacement plantings for those that die off.	<ul> <li>It would enable the use of lower impact tree removal</li> </ul>	methodology and techniques such as habitat pruning	to support biodiversity and through this approach	show leadership and to work at a timescale	appropriate to te taiao.	<ul> <li>It increases the ability for the TMA to address any</li> </ul>	negative impacts such as erosion at a smaller scale.	<ul> <li>It is aligned to both European science, matauranga</li> </ul>	Māori and tikanga Māori.	<ul> <li>It will enable the TMA to achieve its outcomes</li> </ul>	without destruction and will represent a win for all –	the Maunga and its lifeforms, the Tāmaki Collective	and the other people of Auckland.	One submitter questioned whether the statement in	Paragraph 6 on page 106 of the Proposed IMP Amendment	2022, "As a matter of priority, non-native trees on the outer	slopes of the Maunga will be removed to emphasise and	protect the cultural features of the Maunga such as terracing	and rua." means that for the Ōwairaka project that the	proposed removal of non-native trees will be staged, rather	than all removed at once as stated to the community in	November 2019.

heritage value'	values and pathways outlined in the IMP: - Wairuatanga/Spiritual Value: submitters noted that large-scale felling of exotic trees breaches the
	<ul> <li>It immediately removes trees that are invasive, diseased, that present health and safety risks, that are damaging or have the potential to damage cultural features, and that are dangerous as a source of fire.</li> <li>It creates room for natives to be planted and flourish.</li> <li>There are enough native trees remaining to still provide good coverage whilst the new native vegetation grows.</li> <li>It is more practical.</li> <li>Support the TMA working on the basis of the best evidence as to effective ecosystem restoration.</li> <li>Support the TMA's right to exercise tino rangatiratanga over the Maunga.</li> <li>Trust the TMA as the best kaitiaki of the Maunga.</li> <li>It is consistent with the ecological objective to restore indigenous vegetation to the Maunga.</li> </ul>
of	successfully under exotic vegetation in some circumstances, the approach proposed here of removing exotic species is appropriate because it avoids the damage to plantings that would be caused by the need to remove exotic species in future for arboriculture and health and safety reasons.  Other reasons given for supporting the immediate removal of trees include:
	A submission was received acknowledging that while ecological restoration planting may be carried out

"tread gently" nathways and will harm the	Dart 8 of the IMD contains the IMD's provisions for Values and
	0
ecosystems and wairda of the Maunga	Pathways, Each Value IsTollowed by several Pathways
<ul> <li>Mana Aotūroa/Cultural and Heritage Value:</li> </ul>	which provide the tangible expression for each Value.
submitters noted that felling substantial numbers	1+ 10 + 10 + 10 + 10 + 10 + 10 + 10 + 1
of exotic trees breaches the "recognise European	It is a matter of interpretation as to whether it is consistent of
and other histories and interaction with the	
Maunga" pathways.	This was comprehensively considered by the Court of Appeal
<ul> <li>Mauri Pūnaha Hauropi/Ecology and Biodiversity</li> </ul>	who set out the ways in which the ecological restoration
Value: submitters noted that removing hundreds of	project was aligned to the IMP values and pathways. The
mature trees and replacing them with mostly	Court of Appeal judgement (CA21/2021 [2022] NZCA30)
grasses, flaxes and shrubs contradicts the "Maunga	determined that the planting of indigenous flora was
tū mauri ora, Maunga to Makaurau ora/″if the	consistent with, and in fact would implement, many of the
Maunga are well, Auckland is well" and "Restore	policies in the IMP [para 94].
the biodiversity of the Tūpuna Maunga" pathways.	As set out in responses under other sub-headings the
- Mana Hononga Tangata/Living Connection Value:	programme:
submitters noted that felling the exotic trees	programme.
against strong ongoing community opposition	<ul> <li>will be undertaken in a way that ensures the Maunga</li> </ul>
contradicts the 'Actively nurture positive	are not negatively impacted,
relationships' pathway and that the loss of mature	- has been confirmed to have a net ecological benefit,
trees and birdlife that supports connection to the	and
Maunga would negatively impact the ability to	
achieve the 'Rekindle the sense of living connection	- Will invoive significant opportunities for community
between the Maunga and the people' pathway.	involvement in the healing of the Maunga through
- Takotoranga whenua/Landscape Value: submitters	volunteer opportunities.
noted that the tree removals and likely resulting	
erosion impacts and failed plantings are not	
aligned with the pathways 'Protect the integrity of	
the landscape of the Tūpuna Maunga and 'Active	
restoration and enhancement of the natural	
features'.	

Recommend no change.  The purpose of the Ngā Mana Whenua o Tāmaki Makaurau act is to restore ownership of the Maunga to Mana Whenua of Tāmaki Makaurau and provide mechanisms by which Mana Whenua may exercise Mana Whenua and Kaitiakitanga over of all the Maunga.  The removal of the trees is in line with the Mana Whenua more  The submissions on the whakatauki are out of scope (and is not in line with the direction set by Mana Whenua who sit on the Authority or with the views of the Tūpuna Taonga Trust).	e IMP the ingata its thing
Submitters raised concerns that that they believe the proposed clear-felling is not aligned with tikanga Māori and mātauranga Māori, noting:  - Papatūānuku has grown and nurtured everything on the Maunga and should be respected It disregards the values and interconnectedness of all trees and the fauna they support which some submitters referred to as tūpuna and/or tuakana A phased multigenerational strategy would be more aligned to New Zealand's indigenous culture Mātauranga Māori and Tikanga Māori must stay intact through this process, and never be compromised for the sake of a few Mātauranga Māori does not differentiate species in the environment we treat the environment as a whole. When species of trees or birds are valued, based on a native vs exotic narrative, this is a non-Māori construct. Tūpuna Maunga Authority is using a non-Māori construct to fell perfectly healthy trees that Papatūānuku has allowed to grow. This is changing our Mātauranga Māori.	Several submitters highlighted that the whakatauki in the IMP 'Maunga tū Maunga ora, Maunga ora Tāmaki ora – If the Maunga are well, Tāmaki Makaurau is well' has been manufactured for the convenience of the TMA and that the traditional whakatauki is: Ka ora te Whenua, ka ora te tangata – If the Earth is healthy, the people are healthy. One submitter noted that the traditional whakatauki highlights caring for the whenua is the first priority and that everything else must be measured against this. They outlined that the TMA's tree removals are harmful to the whenua and a
Tree removals not in alignment with tikanga Māori and mātauranga Māori	

	Recommend no change.  The budget for the programme is not set by the Integrated Management Plan. The budgets have been agreed to by Auckland Council and the TMA through successive TMA annual operational plans and Auckland Council long term plans and annual plans.
betrayal of all the kaitiaki of birds, plants and other life on the Maunga.  One submitter explained that Ōwairaka is the sacred mountain and the sacred portion of the earth mother Papatūānuku where 345 sacred trees of Tāne Māhuta are living, exist and are providing life to all living things in the environment located in this place. The submitter believes that all things in the universe, in the sky, in the earth, in nature, in the trees, in rocks, in birds, in fish, in all animals in the sea and on the land, in minerals, in water ways, in the mountains, in the geothermal vault line, in earthquakes, in islands, in the atmosphere, in space, in the stars, in the moon, in the sun and humans have one universal life force that binds all things together as one collective energy across space, time, location and dimensions. The submitter notes they are committed to ensuring the life force of the 345 trees are looked after and protected at Ōwairaka as this has an impact on the entire mauri and mana of the mountain and environmental system of Papatūānuku.	Submitters raised a range of concerns about the costs of the programme, primarily focusing on the cost of tree removals.  Submission points included:  The needless and harmful destruction of mature exotic trees is an extreme waste of ratepayer funds in a time of climate crisis and economic hardship.  Auckland Council is heavily in debt and there are a plethora of other more important human and environmental needs that this money could be spent on.
	Costs associated with the programme

	Refer to responses under sub-headings 'Proposed planting' and 'Loss of trees that have historical or heritage value'.	
<ul> <li>Unhappiness at paying for perfectly good trees to be felled, while at the same time being charged a Climate Levy by Auckland Council.</li> <li>A staged approach to transitioning to fully native vegetation would alleviate the significant costs to taxpayers of removal of non-native trees by spreading the costs out over decades and sharing the cost in an ongoing way with those who will enjoy the mountain later.</li> <li>The risk of funding changes on the successful implementation of the programme given the longtime replanting and maintenance to achieve replacement of the canopy/shelter/biomass of the soon-to-be-removed exotic trees.</li> </ul>	Submitters noted that Tāmaki Makaurau / Auckland has a very diverse range of ethnicities and cultures and that the exotic trees are from countries that residents are from and have heritage with.  One submitter noted their ancestors on both sides of the culture planted these trees and advocated that both cultures can live in the trees as they have done for many years. This was echoed by a range of submitters who noted that native trees and exotic trees should be able to co-exist as we do as New Zealanders.  Another submitter noted that the TMA must recognise that the funding for the ongoing maintenance to achieve the outcomes sought in the Native Restoration Plan and through the annual Vegetation Maintenance Programme comes from the diverse cultural population through the Auckland Council. This position was contested by a submitter who claim this is an attempt at making a foreign land more like the home	
	Mix of trees represents community	

	Recommend no change.  Management have worked closely with various community groups to further the work to protect the health and wellbeing of the Maunga, including:  o Öwairaka Rat Baggers o Friends of Maungawhau o Restoring Takarunga Hauraki – Ngā Manu Maungauika, Takarunga Trappers o Matukutūruru – work with the Corrections Department on pest control o Te Pane a Mataaoho/ Te Ara Pueru/ Māngere Mountain – working with Māngere Mountain Education Trust on exploring various education and mara kai opportunities o Maungakiekie Songbird Management has also hosted 17 volunteer days in the last TMA term and is planning many more to undertake much of the planned planting and ongoing maintenance.
European colonisers came from and imposing a foreign culture onto an existing one.	Submitters noted that the project, and more specifically the clear-felling of exotic trees, is causing deep divisions within the community. This is evidenced by this statement by one submitter: I would strongly encourage you to implement a strategy that fulfills not only the goals of the Tūpuna Maunga Authority as stated above (and in the Tūpuna Maunga Integrated Management Plan} but which also doesn't alienate the many people in this city who are in agreement with the ideals of the plan but don't want to see large scale ecological disturbances such as the removal of whole stands of healthy trees from Maunga.  These submitters encourage working with the community in a positive and constructive way, listening to the community's concerns and suggestions, utilising local advocates and sharing more information about the Maunga with visitors and the community.
	Community impacts

		Management is also working closely with immediate neighbours through a number of halo projects and a number of local schools.
		The Matariki activities, Love your Maunga ki Maungauika and Love your Maunga events are other initiatives where the TMA connects with the community.
Impacts on the wider Auckland urban ngahere	Submitters noted that Auckland is rapidly losing green spaces and trees through urban intensification and poor tree protection policy and that meaningful "green space" (e.g. recreational reserves, parks, private covenants) has been relegated to fractionated plots sprinkled here and there.  One submitter noted that some Auckland suburbs lost 35% of their urban forest between 2006 and 2016 and that the impact is especially significant for taller trees, with less than six per cent of the canopy surface occupying heights 20 metres and above for all 16 local boards.  Submitters voiced their concern that the proposed tree removals will exacerbate this issue.  Several submitters opposing removals at Ōtāhuhu / Mount Richmond noted the suburb of Ōtāhuhu already has the lowest tree canopy of any Auckland suburb (under 8% according to the submitter) and the removal of 75% of the canopy cover would have a significant ecological impact.	<ul> <li>Recommend no change.</li> <li>The Proposed IMP Amendment 2022 supports the objectives of Auckland Council's Indigenous Biodiversity Strategy; notably</li> <li>Objective 1: Conserve the greatest number and most diverse range of Auckland's indigenous ecosystems and sequences; and</li> <li>Objective 4: Sustain and protect the mauri of natural and physical resources in ways which enable provision for the social, economic and cultural wellbeing of Māori</li> <li>As reported on 23 May 2022 (Hui 75), the planned planting of 31,448 plants on a number of Maunga in 2022 will take the total number of plants planted on the Maunga since the 2019 planting season to approximately 134,317.</li> <li>This planting together with the future planned planting will result in the Tūpuna Maunga making a significant contribution to the protection and restoration of Tāmaki Makaurau's indigenous biodiversity.</li> </ul>
Detail in the Proposed IMP Amendment 2022	Submitters voiced their desire for greater detail in the plan in relation to proposed tree removals, noting:	Recommend no change. Reserve management plans are not generally specific about particular management decisions which may be proposed.

The majority of contemporary reserve management plans set out vision, principles, objectives and policies. They would typically not include detailed action plans or maps identifying actions in detail.	This was confirmed by Mace Ward who was the General Manager, Parks, Sport and Recreation for Auckland Council at the time the Court of Appeal case was heard. In paragraph 193 of the Court of Appeal judgement (CA21/2021 [2022] NZCA30) it is outlined that Mr Ward confirmed 'he would not expect a reserve management plan to identify that particular trees were proposed to be removed even if they were relatively large in number.'	
<ul> <li>The documents on the Tūpuna Maunga o Tāmaki         Makaurau Authority website are hard to read, and         their intentions are deliberately obtuse.</li> <li>The lack of cohesion and clarity has led to a lot of the         fear/confusion and subsequent strong reactions from</li> </ul>	members of the public.  The IMP should provide details of the numbers of exotic trees on each Maunga which meet each criteria for removal to provide greater clarity to the wider Auckland community and enable a better understanding of the Native Restoration Program and how best to achieve this outcome.  If the final version of the Plan is to be the basis of an	agreement with the community, then it needs to be specific rather than vague.  - From the generalised Plan wording it is difficult to envisage exactly what might be legally attempted on each site. The nearest to a detailed depiction are the artists impressions. If these have any legal standing and the TMA is bound to reasonably follow to the very long term, then the site users and others interested have some firm proposal on which to base their comments. The depictions if proscriptive may reasonably satisfy the doubts of some. But if the Plan words can trump, many Maunga users would have continuing strong reservations relying on just the words of the basic Plan plus Amendment.  - There are material inconsistencies between various TMA reports as to the number of trees to be removed from Ōwairaka – some say 345, others say 298. This further indicates hasty, imprecise operational management that – when TMA is responsible for the enormous value of trees as ecosystem resources,

holders of amenity values and stores of carbon capital – are indicative of lax stewardship and <i>kaitiakitanga</i> .	Specific detail requested included:	- How, when and by whom assessment of the	contribution to the value of the Maunga by exotic	trees (Table 1: Tūpuna Maunga Features p21 Tūpuna	Maunga Strategies) would be carried out and how the	findings and recommendations would be translated	into action. The importance of collecting as much	background information as possible in assessing the	significance of exotic tree planting was noted to be	amply demonstrated in the recent High Court case	(Norman v Tūpuna Maunga o Tāmaki Makaurau	Authority [2020] NZHC 3425) and subsequent Appeal	Court case.	<ul> <li>Percentage of canopy, numbers of each species</li> </ul>	(named) status of health and reasons given for	removal.	<ul> <li>A breakdown of how many of the proposed tree</li> </ul>	removals on Ōwairaka are weeds, pose a health and	safety risk, are a risk to archaeological features or	impact on the cultural landscape and viewshafts.	<ul> <li>A detailed plan outlining a gradual removal of</li> </ul>	sections of trees in each Maunga that has been	discussed with communities of interest on site.	<ul> <li>A timeline for the proposed removal of trees.</li> </ul>	<ul> <li>A tree map that specifies the position and species of</li> </ul>	each individual tree to be removed, and specifies	what species will replace it to match its mature bulk	dimensions, as much as practical.

<ul> <li>Confirmation about whether the proposed amendments to the IMP will be extended to all the</li> </ul>	remaining Maunga covered by the IMP and whether or not additional amendments to the IMP that	provide details of tree removals across the other	Maunga will be released by the TMA. The second added sentence to 10.2"The detail of the	programme is set out in Appendix $5.$ " – is misleading, as Appendix 5 does not give details of the full	programme. Some details are provided for only 4 Maunga, not all Maunga.	One submitter suggested the addition of the following text as an amendment after "Removing trees in a way that avoids	ground alsturbance and nas minimal impact on archaeological features." in each individual Maunga section:	"Detailed plans will be produced outlining the sequential removal and replacement of trees.	Logs and fallen wood will be stacked where possible and left on site to return carbon to the ground and increase fungal and invertebrate life."	In addition to specific requests related to details about tree removals, submitters also noted:	<ul> <li>the language in the Proposed IMP Amendment 2022 is vague and open to interpretation e.g. spiritural,</li> </ul>	indigenous, cultural landscape, mauri and wairua, and - detailed plans also need to show the view shafts, the	official walking routes, type of vegetation, park	furniture sites and special recreation areas, Water	Care and easements, any former quarries and

	unstable areas and any "cultural" or commercial structures.	
Native tree removals	Submitters noted they oppose the removal of native trees as well as exotic trees for largely the same reasons as set out above.  Several submitters queried the inconsistency between the statement in paragraph 6 on page 106 of the Proposed Tūpuna Maunga IMP Amendment where it states, 'To protect the archaeological values and the health and safety of people on the Maunga and non-native trees may also need to be removed' and the individual plans for the four Maunga on pages 107 to 110 which explicitly state for each of the Maunga "All native trees will be retained."  One submitter noted that native trees must be removed or trimmed to create views to the surrounding city, harbour, and distant horizon.	Recommend minor change to paragraph 6 on page 106 to confirm native trees won't be removed to protect archaeological values and the health and safety of people on the Maunga as part of the ecological restoration programme. Native trees will only be removed where they present a health or safety risk. Removals in these circumstances are an operational decision made in accordance with section 42 of the Reserves Act 1977 and health and safety legislation.
PROCESS AND DECISION MAKING	AAKING	
Consultation and engagement	Submitters raised concerns about consultation undertaken to date and this consultation process. Concerns centred around:  - The lack of depth or extent of consideration, debate or consultation with the community that went into the initial policy to remove non-native trees.  - The timing and secrecy of decisions and actions.  - A significant amendment preceding the preparation and adoption of individual Maunga plans in accordance with the Reserves Act 1977 with community engagement.	Recommend no change.  The consultation for the Proposed IMP Amendment 2022 has followed the process set out in the Reserves Act.  The artist impressions in the Proposed IMP Amendment 2022 depict the outcomes of the tree removals and planting.  There has been significant engagement to date through various mechanisms including consultation on the IMP, consultation on the Strategies, consultation on Successive operational plans, consultation on Auckland Council's Annual Plan. The topic of the Authority's restoration programme has been thoroughly aired in the media for some years.

The High Court Decision noted that the draft Annual Operational Plan for 2018/2019 had also been the subject of consultation, and it had included references to the restoration of native ecosystems, reintroducing native plants and "removing inappropriate exotic trees and weeds".  Management will continue to engage with the community through community planting days, Love Your Maunga Events and through the website – where details of plantings plans can be made available.	P
<ul> <li>The lack of genuine engagement opportunities for stakeholders and communities to have input as envisaged in the IMP and input being ignored.</li> <li>The TMA approach to working with the 8 Local Boards which have Maunga in their areas which was seen as a device to obtain consent to their plans without actually engaging with the Maunga local communities as required by the Authority's governance documents and Section 41 of the Reserves Act 1977.</li> <li>The failure of the TMA to be inclusive and as a result its actions being profoundly divisive.</li> <li>The TMA's presentation of the plantings 'cloaking' the Maunga being misleading and no individual Maunga.</li> <li>The need for authorities to bring as many people as possible together and move along a common path given we are in a period of rapid anthropogenic evolution fuelled by climate change and social disruption.</li> <li>The missed opportunity to lead the community – all the peoples of Auckland – to celebrate the city and the country's shared love and appreciation of the Maunga and to unite, invigorate and give life to all Aucklanders' links with each other through a shared love of ngā Maunga.</li> </ul>	Submitters noted their hopes that this matter can be resolved in a spirit of positive partnership, with an appreciation of everyone's values being acknowledged, to bring people together in a peaceful and constructive co-existence. This sentiment was captured by one submitter who stated, 'Ultimately we simply need the best solution for the long

	Recommend no change.  The TMA, the IMP and the annual operational plan drive the operational management of the Tupuna Maunga, as the strategies and plans come into effect over time, those will further inform and guide the management of the Tupuna Maunga. The strategies and individual plans are not a precondition to undertaking operational work, which has been underway since the establishment of the TMA in 2014.  The findings set out in the Court of Appeal judgement (CA21/2021 [2022] NZCA30) are noted:  - [Para 157] 'we are not persuaded it can have been Parliament's intention that s 41(2) of the Collective Redress Act should be applied so as to require the maintenance of exotic trees on the Maunga. We can see nothing in that Act justifying such an approach, which would certainly derive no support from the statement of legislative purpose in s 3. And we
term future of the Maunga, the environment and all the people of Tāmaki Makaurau Auckland.'  One submitter noted they hoped the TMA understand that people who really care for the Maunga are an asset to it and that if the TMA keeps good communication, they will do their best to work for it in a positive way. They encouraged the TMA to build the trust.  Another submitter noted the volcanic cones are held in trust for all the people of Auckland, because the Maunga treaty settlement recognises that they hold a special place in all Aucklanders' hearts. They encouraged the Authority to take account of this when reviewing the submissions and deciding its response.	A range of concerns were raised about the TMA's decision making in relation to the Proposed IMP Amendment 2022.  Submitters' concerns included:  - The removal of certain trees was made without debate of any documented kind by person or persons unqualified to make them and that subsequently have not been supported either by matauranga Māori, basic kaitiakitanga or science.  - The quality of research, the hasty presentation, the poor accuracy, and the evidence of lack of knowledge indicate an Authority not in full grasp of its responsibilities to operate to the highest standards of probity.  - The decision for extensive tree removal goes far beyond the 'routine management' envisaged in the annual operational plan and would be expected to part of an Individual Maunga Plan as set out under 10.32, page 96 (previously 9.32, page 92). This was
	TMA decision making

71 - 6" 1	:
implied by the then Deputy Chair under T. HE	consider it can properly be said that there is a
KOREKO WHAKAPUAKI" IN NET "MESSAGE FROM THE	common benefit in achieving the purpose of the Act,
DEPUTY CHAIR", page 5 (previously "Foreword", page	as well as a particular benefit to mana whenua.
1). "Future individual Maunga plans will provide an	Everyone benefits from the implementation of
opportunity for us to work closely with the Local	legislative measures designed to provide redress for
Boards and diverse communities to produce plans	historical breaches of the Treaty.'
that capture and enhance the unique qualities of	- [Para 168] 'We think it is sufficient to say at this point
each Maunga."	that the project, including removal of the exotic trees,
- Failure to take serious consideration or any	is a legitimate response to the objectives sought to be
consideration of the views of the other peoples of	achieved by the Collective Redress Act.'
Auckland as they are required to do by sections 41(2)	- [Para 168] The argument that the decision to remove
and 109 of Ngā Mana Whenua o Tāmaki Makaurau	the exotic trees was made without having regard to
Collective Redress Act.	the mandatory consideration of common benefit
- The way mana whenua has been determined as a co-	under s 42(2) of the Collective Redress Act also
governance framework.	cannot be sustained for reasons already addressed.
- Te Tiriti o Waitangi lays a foundation of mutual	
respect for and between Māori and non-Māori - this	
duality of respect must underpin the way in which the	
Maunga Authority and Auckland Council express	
kaitiakitanga of the taonga that is our Maunga.	
- A lack of democracy with submitters believing the	
Authority must follow the will of the people and give	
weighting to the views of the views of the very many	
"others" who actually utilise the Maunga.	
- A lack of openness and transparency that has	
produced a significant lack of public trust in the	
Authority.	
- The issue is being treated as a contest between two	
groups, TMA and HTM, and that the initial aims and	
values have been set aside. As a result, decision	
making is about a power struggle and not what will	

create the best outcomes for the Maunga or the	people.	<ul> <li>The decision was through a decision of a committee</li> </ul>	rather than in accordance with tikanga.	- The impacts of the proposed tree removals on the co-	governance model, with some raising concerns about	the impacts on support for the co-governance model	more generally.	<ul> <li>Timing of decisions that have a significant impact on</li> </ul>	individual Maunga ahead of the development of	individual management plans.	- TMA's failure to produce Individual Maunga Plans in	breach of its duties under the Reserves Act.	- The draft Strategies document for Owairaka was not	released for public comment until 6 July 2019 – on	the TMA agenda for Hui 49, 5 August 2019, with	approval of TMA members at Hui 50 on 25	September 2019. Yet Resource Consent for the	removal of 345 trees was granted four months	earlier, on 24 February 2019. None of the trees in the	2018 reports on which the Resource Consent relied	were assessed according to the criteria in the	September 2019 Strategies document. At best, this is	procedurally inept, but other interpretations are	available.	<ul> <li>No tree, native or non-native, has been assessed</li> </ul>	according to the criteria promulgated in the IMP	Strategies document.	<ul> <li>There are inconsistencies between proposals passed</li> </ul>	in Hui 77 regarding amendment of the IMP and the	amendments presented for consultation. This	includes the proposal to remove native as well as	exotic trees, the omission of certain Individual

Maunga Plans and it remains the case that non- notified Resource Consents obtained are not compliant with the Biodiversity Strategy of 25 September 2019. The issue at governance is whether or to what extent the variations between proposals passed by TMA and documents now published were fully considered by TMA.  - The need to put Papatuanuku or Mother Earth and all the life-forms she supports at the front and centre of decision making by respecting the environment and everything that lives in it.  - How particular iwi representatives are appointed and how their accountability to iwi is reflected in practice. Many local Māori, including members of Ngāti Whātua, have gone to the media saying that the destruction of exotic trees is actually against their principles.  One submitter noted it would be good for decisions to be made at the Maunga themselves in the presence of the trees which the Maunga themselves in the presence of the trees which the Maunga have hosted and nurtured as natives or as manuhiri exotics over many decades. They also hoped that those who make these decisions would visit the Maunga that have already experienced a mass-felling policy and consider whether that policy as applied so far has really served the aspirations of the Maunga Authority to enhance the mauri of the tūpuna Maunga.	Submitters in support of the TMA noted:	<ul> <li>They are confident in the TMA and believe in their right to manage the Maunga as they see fit, for the benefit of future generations.</li> </ul>

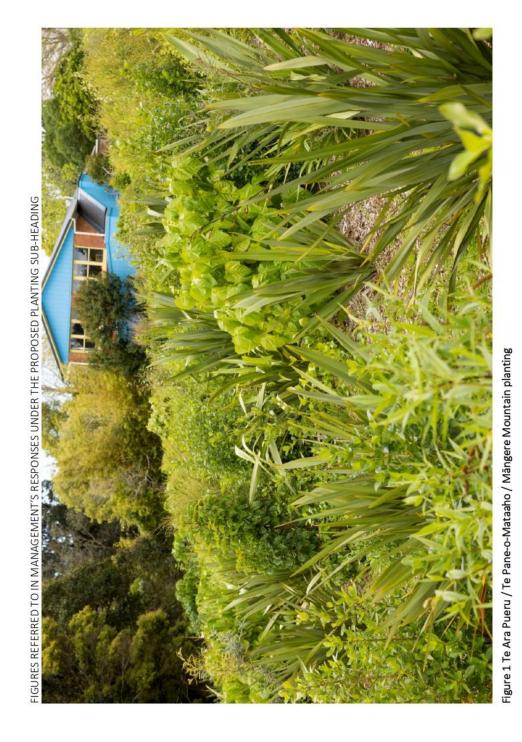
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- IIIey suppoir without Hesitation file fillo	rangatiratanga of the Tūpuna Maunga Authority over	all the ancestral Maunga in Tāmaki Makaurau.	<ul> <li>The TMA has sole discretion on how the Maunga are</li> </ul>	to be managed and developed, aided by Auckland	Council in implementing these plans.	<ul> <li>Against historical background and the Redress Act</li> </ul>	this consultation is itself a watering down of the rights	already granted to the TMA because the choice to fell	a tree, or any number of trees, falls within the scope	of mana whenua and kaitiakitanga. You should not	have to listen to me, or anyone. As the living	relatives of these Maunga, you have the right to	make decisions on their future. You have the right to	make mistakes, because as kaitiaki you will need to	learn from these and put them right again. All this	will take time, and you have the right to take perhaps	160 years before the wider community judges	whether your work is successful or not.	<ul> <li>Their desire to fully honour the 2014 Tiriti</li> </ul>	settlement between the Crown and Tāmaki	Collective, including honouring the TMA plans for the	ecological and cultural restoration of the Maunga.	<ul> <li>The Tāmaki Collective have received the 14 Tūpuna</li> </ul>	Maunga as compensation for generations of land theft	and abuse, which was completely contrary to the	Treaty of Waitangi and standards of human decency.	To stand in the way of kaitiaki restoring and	protecting these taonga for everyone's future	benefit, as they have planned, would result in	another generation of land theft and abuse of	indigenous people.

Owaliaka / Te Alirka-a- Specific citaliges requested include: Rakatuara / Mount Albert

section not already	Page 107, ÖWAIRAKA/TE AHI-KĀ-A-RAKATAURA/MT ALBERT.	- Correct typos in the Maunga name and artist
covered in sub-headings above	<ul> <li>Image caption: "Artist impression of the" is repeated.</li> <li>Opening paragraph, "Ōwairaka-te Ahi-kā-a-Rakataura,": Forward slash (/) required to replace hyphen (-) after Ōwairaka.</li> <li>Opening paragraph, line 2: "an exemplar WF7 Pūriri ngahere will be created": Review this given number of existing native trees to be retained that aren't characteristic of an exemplar WF7 Pūriri ngāhere as found on basalt volcanoes in the Auckland area.</li> </ul>	impression title.  Refer to recommended change under sub-headings 'Proposed Planting' and 'Loss of trees that have historical value' for responses and recommended changes.Re-establishing the critically endangered WF7 Pūriri ngāhere on the Maunga has been was recommended by the ecologist that prepare the planting plan and Auckland Council's Environmental Services Department.
Ōtāhuhu / Mount Richmond section not already covered in sub- headings above	Specific changes requested include:  • According to the Treescape report (amended May 2021 by Arborlab) outlines the plane tree is the only non-native tree proposed to be retained. The wording "(not all)" is therefore misleading, as "not all" indicates that at least some non-native trees are to be retained. Suggested wording is: "Approximately 443 of 444 non-native trees and shrubs (not all) will be removed,:"	Refer to recommended change under sub-headings 'Loss of trees that have historical value' and 'Visual amenity and amenity impacts'. Refer to Management response under sub-heading 'Detail in the Proposed IMP Amendment 2022' for response to requests for greater detail.
Te Tātua-a-Riukiuta / Big King section	<ul><li>Specific changes requested include:</li><li>Remove "(not all)" if all non-native trees will be removed as set out in Appendix C: Itemised Tree Inventory.</li></ul>	Recommend no change. Refer to recommended change under sub-heading 'Loss of trees that have historical value'.
OTHER MATTERS		

Recommend no change. This is out of scope.	Recommend no change. This is out of scope.	Recommend no change. This is out of scope.
Submitters noted the process of public notification of resource consent applications is essential to provide the opportunity for local knowledge to be carefully tabled and evaluated to inform planning. They believe that the significance of specific exotic tree plantings on the Maunga may only be known to particular local residents, and meaningful engagement with local residents will encourage ongoing support for the work of the TMA.  They note importance of collecting as much background information as possible in assessing the significance of exotic tree planting was amply demonstrated in the recent High Court case (Norman v Tūpuna Maunga o Tāmaki Makaurau Authority [2020] NZHC 3425) and subsequent Appeal Court case.  There were requests for the resource consent applications to be notified and for information to be pro-actively sought from the public prior to consent applications being lodged.	Majority of action@campaignnow.nz submitters, as well as many other submitters, stated their concerns and opposition to tree removals extend to other Maunga.  Submitters noted the need for early engagement on plans for any other Maunga given the community interest in these significant landmarks.	One submitter raised that the IMP approved on 23 June 2016 Restates that review will take place every five years but that it hasn't been reviewed yet and no reason for the delay is available.
Resource consent	Other Maunga not covered by the IMP amendment	IMP review

Recommend no change. This is out of scope.	At the time of its adoption the Integrated Management Plan did not include both the Chair's and the Deputy Chair's mihimihi/introductions, but there were placeholder pages in place. The mihimihi/introductions were as agreed at Hui 19 on 23 June 2016 and their inclusion was pursuant to the delegation to the Chair and Deputy Chair as provided by the Authority at that hui (and as recorded in the public minutes). The later inclusion of such mihimihi in reserve management plans is a common practice. It also noted that the introductions/mihimihi by the Chair and Deputy Chair do not set out any matters for the control or management of the Tūpuna Maunga.	
Submitters noted that the IMP as amended carries a new Chair's Introduction. They raised concerns that this Introduction sets out a substantive agenda that amounts to a	divisive programme aimed at proclaiming TMA's total control did not include both the Chair's and the Deputy Chair's amendments to be commented highly egregious and misleading. They believe the separation of the Chair's minimihi/introductions were as agreed at Hui 19 on 23 June 2016 and their inclusion was pursuant to the delegation to the Chair and Deputy Chair as provided by the Authority at that hui (and as recorded in the public minutes). The later inclusion of such mihimihi in reserve management plans is a common practice. It also noted that the introductions/mihimihi by the Chair and Deputy Chair do not set out any matters for the control or management of the Tūpuna Maunga.	
Chair's introduction in the IMP		



51



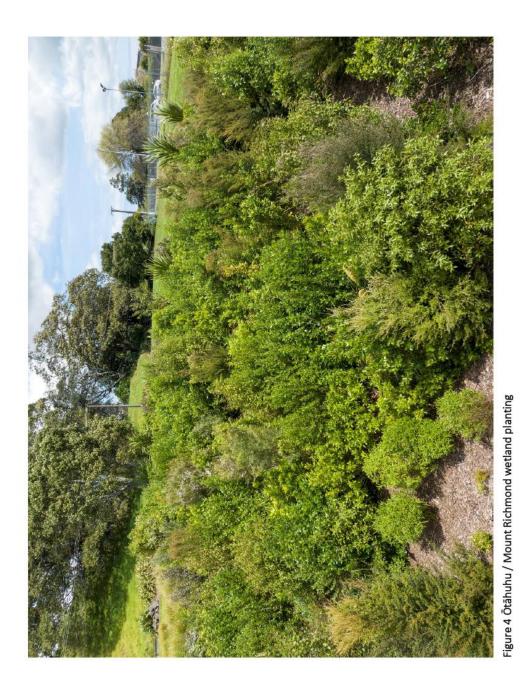
Figure 2 Te Ara Pueru / Te Pane-o-Mataaho / Māngere Mountain planting

52



53

Figure 3 Ōtāhuhu / Mount Richmond planting



54



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99

PROPOSED TÜPUNA MAUNGA INTEGRATED MANAGEMENT PLAN RECOMMENDED CHANGES IN RESPONSE TO SUBMISSIONS ATTACHMENT D

M	RECOMMENDED CHANGES	REASON
Page No	Insertions <u>Underlined</u> Deletions strikethrough	
88	10.2 AMEND TO: Also, aAn ecological restoration programme will assist the cultural, spiritual and ecological restoration of the Tūpuna Maunga, including the planting of native species and removal of not all non-native trees.	Proposed amendment connects detail of the programme to existing text in the IMP and reflects change to retain some representative non-native trees.
106	Paragraph 1, Sentence 2: AMEND TO 'Over many decades, native trees species'	Grammatical correction
106	Paragraph 1, Sentence 3: AMEND TO 'Non-native trees In some cases, trees planted to mitigate the impacts of quarrying and other developments, have been randomly located without any a comprehensive plan for their future management or consideration of the cultural landscape.'	Submitters' points of some planting being intentional and that the lack of consideration for the cultural landscape applied to the planting of both native and non-native trees.
106	Paragraph 1, Sentence 4: AMEND TO 'Many non-native trees, including pest plant and weed species (some being identified in the Regional Pest Management Plan (RPMP)) have been allowed to self-seed	Proposed amendment addresses submitters' points about the use of the terms 'weeds' and 'pest plants'. There are species on the Maunga which are not pest plants but which are still considered weedy species. The proposed amendment to paragraph 2 specifies pest plants in Regional Pest Management Plan will be removed and so is not required in this paragraph.

IMP Page	RECOMMENDED CHANGES Insertions <u>Underlined</u>	REASON
	Deletions strikethrough	
106	This has seriously adversely affected the integrity of the cultural landscapes <u>and the indigenous biodiversity of</u> the taonga tuku iho that are the Tūpuna Maunga	Proposed amendment addresses submitters' points that uncontrolled self-seeding of trees has also affected the indigenous biodiversity.
106	Para 2, Sent 1: AMEND TO 'The purpose of the Native Restoration Programme is to facilitate the restoration of the natural, spiritual and indigenous-cultural landscape of the Maunga.	Proposed amendment addresses submitters' points about alignment with the IMP and IMP strategies and ensures the consistent terminology is used.  The IMP sets out the importance of protecting the tihi/crater as a significant geological and cultural landscape feature from physical damage and building on the Tūpuna Maunga as cultural landscapes in the wider context of Tāmaki Makaurau.  The Design Strategy, Biosecurity Strategy and Biodiversity Strategy reference the recognition, protection and/or restoration of the cultural landscape.
106	Para 2, Sent 2: AMEND TO 'This will include massive plantings of native species and the removal of non-native trees that are negatively impacting features of the Maunga.  - Substantial plantings of native species to increase the biodiversity, restore and sustain landscape values, stabilise slopes and serve operational outcomes, enable cultural traditions and create exemplar WF7& Pūriri ngahere in locations that recognise important views, archaeological sites and cultural landscapes	Proposed amendment addresses submitters' points on tree removals and the restoration to fully native vegetation.  The amendment addresses the programme and utilises wording consistent with the IMP values and pathways and IMP strategies.

Μ	RECOMMENDED CHANGES	REASON
Page	Insertions <u>Underlined</u>	
<u>8</u>	Deletions strikethrough	
	- Removal of all pest plants in the Regional Pest Management Plan	
	(RPMP),	
	Kemoval of non-native trees that negatively or have the potential	
	to negatively impact the archaeological fabric of the Maunga.  Removal of non-native trees that block or have the notential to	
	block sightlines from the Maunga to other Maunga/pā and other	
	significant viewshafts,	
	<ul> <li>Removal of non-native trees presenting health and safety risks.</li> </ul>	
	- Removal of non-native trees to create/enhance cultural	
	landscapes, and	
	<ul> <li>Ongoing pest plant, pest animal and weed control to protect new</li> </ul>	
	plantings, existing trees and fauna and prevent reinvasion and	
	spread of pest plant and weed species.	
	This will help restore and enhance the mauri and wairua of the Tūpuna	
	Maunga.'	
106	Paragraph 3: DELETE 'The restoration programme will ensure that the remaining cultural and archaeological fabric of the Maunga is protected, and made visible by removing non-native trees that are having a negative impact. Sight lines from the Maunga to other Maunga/pā will be	Not required as included in proposed amendment to paragraph 2.
	opened to ensure that the connection from Maunga to Maunga is prominent.	
106	Paragraph 4: DELETE 'All plant species identified in the RPMP will be removed.	Not required as included in proposed amendment to paragraph 2.

MP	RECOMMENDED CHANGES	REASON
Page No	Insertions <u>Underlined</u> Deletions strikethrough	
901	Paragraph 5: DELETE 'Further guidance has been given regarding non-native trees as part of the Tüpuna Maunga Biosecurity Strategy <sup>‡</sup> .  Footnote¹: DELETE 'Pg 34 section 6 of the Biosecurity Strategy states: Removal of exotic trees will occur when there is a health and safety risk, they are identified as a weed species, there is risk to archaeological features, or they impact on the cultural landscape and viewshafts. Any other tree removals will be assessed on a case by case basis.	Not required as detail this was referring to is included in the proposed amendment to paragraph 2.
106	Paragraph 6: AMEND TO 'As a matter of priority, non-native trees on unmodified areas and outer slopes of the Maunga will be removed to emphasise and protect the cultural features of the Maunga such as terracing and rua, and also to protect the archaeological values and the health and safety of people on the Maunga native and non-native trees may also be removed.	Proposed amendment addresses submitters' points on programme timing and confirms native trees are not to be removed as part of the programme.
106	INSERT new sentence at bottom of page: 'A selection of representative mature, healthy and significant non-native trees² in modified areas of the Maunga will be retained.  Footnote 2: Note that while all care will be taken to preserve non-native trees identified for retention, they will be removed if they are failing or unsafe.	Proposed amendment addresses submitters' requests for retention of some non-native trees.
107	AMEND all names to 'Ōwairaka / Te Ahi-kā-a-Rakatuara / Mount Albert'	Consistent spacing and spelling.
107	Description under artist impression: AMEND TO 'A <del>rtist impression of th</del> Artist impression of the native restoration programme <del>of Ōwairaka/ Te</del>	Typo correction.

IMP Page No	RECOMMENDED CHANGES Insertions <u>Underlined</u> Deletions strikethrough	REASON
	Ahikā-a-Rakataura/Mt Albert-Ōwairaka / Te Ahi-kā-a-Rakatuara / Mount Albert'	
107	Paragraph 1: AMEND TO 'To achieve the cultural, spiritual and ecological restoration of Ōwairaka / Te Ahi-kā-a-Rakatuara / Mount Albert an exemplar WF7 Pūriri ngahere² will be created as a representation of the forest that once stood on and/or near the Maunga. Key components of the native restoration programme are:	Proposed amendment makes wording consistent with other individual maunga sections and clarifies that the points below are key components of the programme.
107	Left hand column, Point 1: AMEND TO- 'A minimum of Approximately 13,000 native plants'	Enables the TMA to do more plantings if required for infill/enrichment planting or if other areas identified for further planting.
107	Left hand column, Point 2: AMEND TO 'A <del>mong the native plantings, culturally </del> Significant species will be planted to ensure that cultural traditions such as whakairo, raranga, and rongoa collection can continue into the future.'	Proposed amendment makes wording consistent with other individual maunga sections and clarifies that plantings will see cultural traditions continued into the future.
107	ADD new component: 'Mound planting of native species, including pōhuehue, will be trialled on the southeast face to replace grass cover, protect archaeology, limit erosion and damage, while not impacting sightlines.'	Proposed addition addresses submitters' points on increased plantings.
107	Left hand column, Point 5: AMEND TO 'Pest control will be intensified over time to ensure the protection of the continuous ngahere ngahere established near the tihi.'	Typo correction.

IMP Page No	RECOMMENDED CHANGES Insertions <u>Underlined</u> Deletions strikethrough	REASON
107	Left hand column, Point 6: AMEND TO ' <u>A maximum of Approximately</u> 345 exetie <u>non-native</u> trees <u>(not all)</u> will be removed. <del>, including weed species identified in the RPMP'</del>	Proposed amendment to page 106 provides for potential retention of some non-native trees which may mean total number of trees to be removed is less than previously planned. Move 'including weed species identified in the RMP' position across to the right hand bullet points under 'The Methodology of the Programme will include:'
107	Right hand column, point 1: AMEND TO 'Retaining the tihi in grass and native species'	Acknowledges the tihi has native species already growing on the tihi.
107	Right hand column, point 5: AMEND TO 'Ensuring that all trees that present a health and safety risk and/or are pest plants identified in the RPMP are removed.'	Moves point from left hand column to right hand column as it is part of the methodology.
107	Retention of selected existing non-native trees  Tree types to be confirmed for retention include mature, healthy, and significant examples of Holm Oak, Silky Oak, Scarlet Oak, Eucalyptus and Cherry (non-invasive) trees  There will be no retention of species identified in the RPMP	Proposed amendment addresses submitters' points on retention of some non-native trees. Proposed level of detail is appropriate for a reserve management plan.
108	AMEND all names to 'Pukewīwī / Puketāpapa / Mount Roskill'	Consistent spacing and spelling.

IMP	RECOMMENDED CHANGES	REASON
Page No	Insertions <u>Underlined</u> Deletions strikethrough	
108	Paragraph 1: AMEND TO  To achieve the cultural, spiritual and ecological restoration of Pukewīwī  / Puketāpapa / Mount Roskill a range of native species will be planted as a representation of the forest and ecosystems that once stood on or—and—near the Maunga. Key components of the native restoration programme are:	Proposed amendment makes wording consistent with other maunga and clarifies that the points below are key components of the programme.
108	Left hand column, Point 1: AMEND TO- 'A minimum of Approximately 7,400 native plants	Enables the TMA to do more plantings if required for infill/enrichment planting or if other areas identified for further planting.
108	Left hand column, Point 2: AMEND TO 'Among the native plantings, culturally Culturally significant species to ensure that cultural traditions such as whakairo, raranga, and rongoa collection can continue into the future.	Proposed amendment makes wording consistent with other individual maunga sections and clarifies that plantings will see cultural traditions continued into the future.
108	Left hand column, Point 6: REMOVE: 'Further planting sites will be identified in the future.'	Planting sites haven't been detailed in the Proposed IMP Amendment 2022. In response to submissions seeking a greater extent of planting, Management will continue to seek out opportunities to plant more native species where this can be achieved without compromising important visual connections, archaeological sites and cultural landscapes. This will be in accordance with the Proposed IMP Amendment 2022.

Page No	RECOMMENDED CHANGES Insertions <u>Underlined</u> Deletions strikethrough	REASON
108	Left hand column, Point 9: AMEND TO ' <u>A maximum of Approximately</u> -160 non-native trees (not all) will be removed <del>, including weed species in the RPMP</del> .	Proposed amendment to page 106 provides for potential retention of some non-native trees which may mean total number of trees to be removed is less than previously planned. Move 'including weed species identified in the RMP' position across to the right hand bullet points under 'The Methodology of the Programme will include:'
109	Right hand column, point 5: AMEND TO 'Ensuring that all trees that present a health and safety risk <u>and/or are pest plants identified in the RPMP</u> are removed.'	Moves point from left hand column to right hand column as it is part of the methodology.
109	Non-native Tree Retention  Tree types to be confirmed for retention include mature, healthy, and significant examples of Deodar Cedar, Manna Ash, Boxelder Maple, Japanese Cedar and Olive trees.  There will be no retention of species identified in the RPMP	Proposed amendment addresses in part submitters' requests for retention of some non-native trees. Proposed level of detail is appropriate for a reserve management plan.
109	AMEND all names to 'Ōtāhuhu / Mount Richmond'	Consistent spacing and spelling.
109	Paragraph 1: AMEND TO 'To achieve the cultural, spiritual and ecological restoration of Te Tātua a Riukiuta / Big King Ōtāhuhu / Mount Richmond a WF7 Pūriri ngāhere ngahere forest type will be planted as a representation of the forests that stood on and/or near the Maunga. Key components of the native restoration programme are:	Proposed amendment corrects typo, makes wording consistent with other maunga, and clarifies that the points below are key components of the programme.

IMP Page No	RECOMMENDED CHANGES Insertions <u>Underlined</u> Deletions strikethrough	REASON
109	Left hand column, Point 1: AMEND TO 'A minimum of Approximately-of 39,000 native plants will be planted'	Enables the TMA to do more plantings if required for infill/enrichment planting or if other areas identified for further planting.
109	Left hand column, Point 2: AMEND TO 'and rongoa collection ean continue into the future.	Proposed amendment clarifies that plantings will see cultural traditions continued into the future
109	Left hand column, Point 4: AMEND TO 'Pest control will be intensified over time to ensure the protection of the continuous ngahere ngahere established near the tihi.'	Typo correction.
109	Left hand column, Point 6: AMEND TO ' <u>A maximum of Appreximately</u> 443 non-native trees a <del>nd shrubs</del> (not all) will be removed <del>, including weed species in the RPMP</del> .	Proposed amendment to page 106 provides for potential retention of some non-native trees which may mean total number of trees to be removed is less than previously planned. Point only relates to trees and not shrubs. Move 'including weed species identified in the RMP' position across to the right hand bullet points under 'The Methodology of the Programme will include:'
109	Right hand column, point 5: AMEND TO 'Ensuring that all trees that present a health and safety risk and/or are pest plants identified in the RPMP are removed.'	Moves point from left hand column to right hand column as it is part of the methodology.
109	<ul> <li>Non-native Tree Retention</li> <li>Tree types to be confirmed for retention include mature, healthy, and significant examples of London Plane, English Oak, She-Oak and Olive trees.</li> </ul>	Proposed amendment addresses submitters' requests for retention of some non-native trees. Proposed level of detail is appropriate for a reserve management plan.

IMP Page No	RECOMMENDED CHANGES Insertions <u>Underlined</u> Deletions strikethrough	REASON
	• There will be no retention of species identified in the RPMP	
110	DELETE artist impression placeholder and footnote 3 and INSERT new artist impression and title.	Proposed amendment replaces place holder. New artist impression was not completed at time of public notification, however, was put on to the <a href="https://www.maunga.nz">www.maunga.nz</a> website during the public consultation period.
110	AMEND all names to 'Te Tātua-a-Riukiuta / Big King'	Consistent spacing and spelling.
110	Paragraph 1: AMEND TO 'To achieve the cultural, spiritual and ecological restoration of Te Tātua-a-Riukiuta / Big King a WF7 Pūriri ngāhere ngahere forest type will be planted as a representation of the forests that stood on and/or near the Maunga. Key components of the native restoration programme are:	Proposed amendment corrects typo, makes wording consistent with other maunga, and clarifies that the points below are key components of the programme.
110	Left hand column, Point 1: AMEND TO- 'A minimum of Approximately-of 9,000 native plants will be planted'	Enables the TMA to do more plantings if required for infill/enrichment planting or if other areas identified for further planting.
109	Left hand column, Point 2: AMEND TO 'and rongoa collection ean continue into the future.	Proposed amendment clarifies that plantings will see cultural traditions continued into the future
110	Left hand column, Point 6: AMEND TO 'A maximum of Approximately-197 non-native trees and shrubs (not all) will be removed, including weed species in the RPMP.	Proposed amendment to page 106 provides for potential retention of some non-native trees which may mean total number of trees to be removed is less than previously

IMP Page No	RECOMMENDED CHANGES Insertions <u>Underlined</u> Deletions strikethrough	REASON
		planned. Point only relates to trees and not shrubs. Move 'including weed species identified in the RMP' position across to the right hand bullet points under 'The Methodology of the Programme will include:'
110	Right hand column, point 5: AMEND TO 'Ensuring that all trees that present a health and safety risk and/or are pest plants identified in the RPMP are removed.'	Moves point from left hand column to right hand column as it is part of the methodology.
110	Non-native Tree Retention     Tree types to be confirmed for retention include mature, healthy, and significant examples of Japanese Cedar, English Oak and Silky Oak trees.  There will be no retention of species identified in the RPMP	Proposed amendment addresses submitters' requests for retention of some non-native trees. Proposed level of detail is appropriate for a reserve management plan.

## POLICIES OF THE TÜPUNA MAUNGA **AUTHORITY** The Tūpuna Maunga Authority has released a series of policies, frameworks and decisions that reflect and deliver the Values and Pathways including: **10.1** The Values and Pathways will be delivered as follows: · Alcohol-free and smoke-free Tūpuna Maunga Policy; Vehicle-free tihi of Maungawhau / Mt Eden Decision (while · Plans and policies prepared by the Tūpuna Maunga ensuring access for those with restricted mobility); · Decisions of the Tūpuna Maunga Authority; · Filming and Events Framework; · Health and Safety Policy; · Annual Tūpuna Maunga Operational Plan; · Tūpuna Maunga Weed Control Programme; · Preparation of Tūpuna Maunga guidelines and strategies; · Integrated Public Access Times Decision; · Preparation of individual Tūpuna Maunga Plans; · Expired lease/licence Decisions; and Advocacy to Auckland Council, central government and the private sector, regarding policies plans and bylaws (for example the Auckland Unitary Plan); Bylaws review. ANNUAL TÜPUMA MAUNGA OPERATIONAL PLAN Advocacy supporting a World Heritage nomination, and · Other legislation. The Tūpuna Maunga Authority and Auckland Council must agree an Annual Tūpuna Maunga Operational Plan for each financial year to provide a framework in which Council will carry out the These measures set the direction for achieving the care and protection of the Tūpuna Maunga. Also, Aan ecological restoration programme will assist the cultural, spiritual and ecological restoration of the Tūpuna Maunga, including the planting of native species and removal of not all non-native trees. The detail of the programme is set out in Appendix 5. routine management of the Tūpuna Maunga and administered Fees and charges will be reviewed annually to coincide with the Tūpuna Maunga Operational Plan. 10.5 88 Integrated Management Plan

## Appendix 5: Native restoration of Tūpuna Maunga

Returning native vegetation is a key step in healing the Tūpuna Maunga. Over many decades, native trees species have been removed from the Maunga. Non-native trees In some cases, trees planted to mitigate the impacts of quarrying and other developments, have been randomly planted—located without any—a comprehensive plan for their future management or consideration of the cultural landscape. Many non-native trees, including pest plant and weed species (some being identified in the Regional Pest Management Plan (RPMP)), have been allowed to self-seed by legacy administering entities. This has seriously adversely affected the integrity of the cultural landscapes and indigenous biodiversity of the taonga tuku iho that are the Tūpuna Maunga.

The purpose of the Native Restoration Programme is to facilitate the restoration of the natural, spiritual and <u>indigenous cultural</u> landscape of the Maunga. This will include:

- Substantial plantings of native species to increase the biodiversity, restore and sustain landscape values, stablise slopes and serve operational outcomes, enable cultural traditions and create exemplar WF7 Püriri ngahere in locations that recognise important views, archaeological sites and cultural landscapes,
- Removal of all pest plants in the Regional Pest Management Plan (RPMP),
- Removal of non-native trees that negatively, or have the potential to, negatively impact the archaeological fabric of the Maunga,
- Removal of non-native trees that block, or have the potential to, block sightlines from the Maunga to other Maunga/pā and other significant viewshafts,
- Removal of non-native trees presenting health and safety risks,
- Removal of non-native trees to create/enhance cultural landscapes,
   and
- Ongoing pest plant, pest animal and weed control to protect new plantings, existing trees and fauna, and prevent reinvasion and spread of pest plant and weed species.

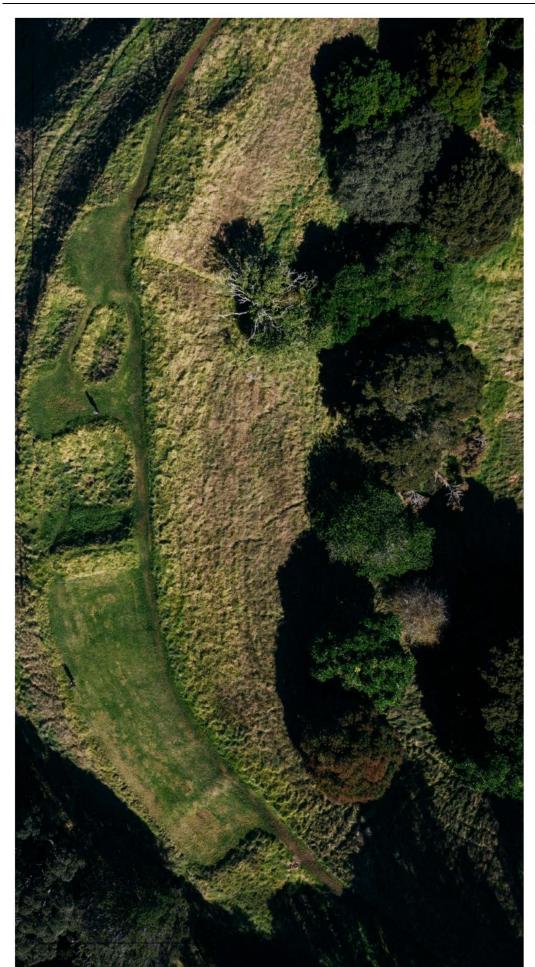
-massive plantings of native species and the removal of non-native trees that are negatively impacting the cultural features of the Maunga. This will help restore and enhance the mauri and wairua of the Tūpuna Maunga.

The restoration programme will ensure that the remaining cultural and archaeological fabric on the Maunga is protected, and made visible by removing non-native trees that are having a negative impact. Sight lines from the Maunga to other Maunga/pā will be opened to ensure that the connection from Maunga to Maunga is prominent.

All plant species identified in the RPMP will be removed.

Further guidance has been given regarding non-native trees as part of the Tūpuna Maunga Biosecurity Strategy<sup>1</sup>.

As a matter of priority, non-native trees on unmodified areas and outer



slopes of the Maunga will be removed to emphasise and protect the cultural features of the Maunga such as terracing and rua, and also to protect the archaeological values and the health and safety of people on the Maunga native and non-native trees may also be removed.

A selection of representative mature, healthy and significant non-native trees in modified areas of the Maunga will be retained.

Strategy states: Removal of exotictrees will occur when there is a health and safety risk, they are identified as a weed species, there is risk toarchaeological features, or they impact on the cultural landscape and viewshafts. Any other tree removals will be assessed on a case by case-basis.

<sup>&</sup>lt;sup>1</sup> Note that while all care will be taken to preserve non-native trees for identified retention, they will be removed if they are failing or unsafe.



# ŌWAIRAKA / TE AHI-KĀ-A-RAKATAURA / MOUNTT

To achieve the cultural, spiritual and ecological restoration of  $\bar{O}$  wairaka te Ahi kā a-Rakataura,  $\bar{O}$  wairaka / Te Ahi-kā-a-Rakatuara / Mount Albert an exemplar WF7 Pūriri ngāherengahere² will be created as a representation of the forest that once stood on a n d / or and near the Maunga. Key components of the native restoration programme are:

Approximately A minimum of 13,000 native plants will be planted (of which approximately 5,180 have already been planted and are maturing well).

Among the native plantings, cCulturally significant species will be planted to ensure that cultural traditions such as whakairo, raranga, and rongoa collection can continue into the future.

Habitats for mokomoko and other native fauna will be restored.

Mound planting of native species, including pōhuehue, will be trialled on the southeast face to replace grass cover, protect archeology, limit erosion and damage, while not impacting sightlines

Pest control will be intensified over time to ensure the protection of the continuous <a href="mailto:ngāherengahere">ngāherengahere</a> established near the tihi.

All native trees will be retained.

Approximately A maximum of 345 non-native exotic-trees (not all) will be removed, including-weed species identified in the RPMP.

Artist impression of th Artist impression of the native restoration programme of Ōwairaka/ Te Ahikā a Rakataura/Mt Albert\_Ōwairaka / Te Ahi-kā-a-Rakatuara / Mount Albert

### THE METHODOLOGY OF THE PROGRAMME WILL INCLUDE:

- Retaining the tihi in grass and native species.
- Planting in areas where in situ archaeology has been destroyed by historic quarrying.
- Selecting appropriate plants that can be planted near archaeological features.
- Removing trees in a way that avoids ground disturbance and has minimal impact on archaeological features.
- Ensuring that all trees that present a health and safety risk and/or are pest plants identified in the RPMP are removed.

### Retention of selected existing non-native trees

- Tree types to be confirmed for retention include mature, healthy, and significant examples of Holm Oak, Silky Oak, Scarlet Oak, Eucalyptus and Cherry (non-invasive) trees.
- There will be no retention of species identified in the RPMP.

Integrated Management Plan 107

A WF7 P

üriri ng

here gahere
forest type is a broadleaf forest
that occurs in warm frost-free
areas on fertile soils of alluvial
and volcanic origin.



Artist impression of native restoration programme of Pukew $\bar{\imath}w\bar{\imath}_{\underline{\prime}}$  / Puket $\bar{\imath}$ papa / M $\underline{oun}$ t Roskill

## PUKEWĪWĪ/PUKETĀPAPA/MOUNT ROSKILL

To achieve the cultural, spiritual and ecological restoration of Pukewīwī/ Puketāpapa / Mount Roskill a range of native species will be planted as a representation of the forest and ecosystems that once stood on and/or near the Maunga. Key components of the native restoration programme are:

Approximately A minimum of 7,400 native plants will be planted (of which 4,800 have already been planted and are maturing well).

Among the native plantings, cCulturally significant species will be planted to ensure that cultural traditions such as whakairo, raranga, and rongoa collection cancontinue into the future.

A pā harakeke will be established on the Maunga.

A mara kai will also be established on the Maunga, which will include amenity native tree plantings and traditional Māori kai.

Several large native specimen trees will also be planted.

Further planting sites will be identified in the future.

Pest control will be intensified over time to ensure the protection of the continuous <a href="mailto:ngāherengahere">ngāherengahere</a> established near the tihi.

All native trees will be retained.

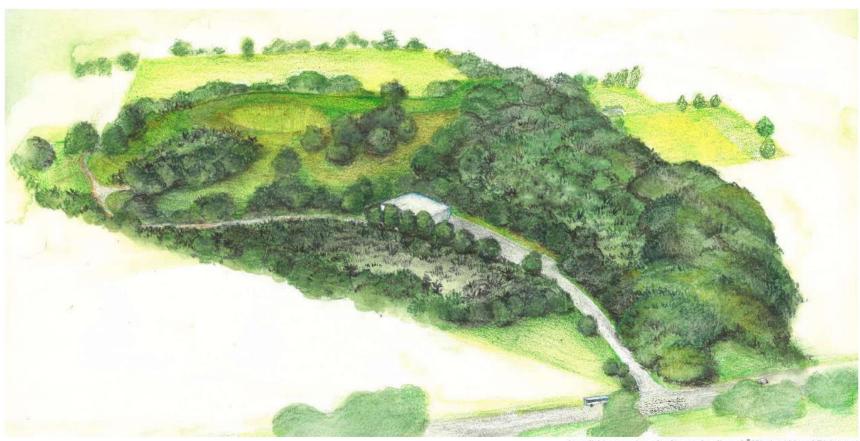
Approximately A maximum of 160 non-native trees (not all) will be removed, including weed species identified in the RPMP.

### THE METHODOLOGY OF THE PROGRAMME WILL INCLUDE:

- Retaining the tihi in grass.
- Planting in areas where in situ archaeology has been destroyed by historic quarrying
- Selecting appropriate plants that can be planted near archaeological features.
- Removing trees in a way that avoids ground disturbance and has minimal impact on archaeological features.
- Ensuring that all trees that present a health and safety risk <u>and/or are pest plants</u> identified in the <u>RPMP</u> are removed.

### Retention of selected existing non-native trees

- Tree types to be confirmed for retention include mature, healthy, and significant examples of Deodar Cedar, Manna Ash, Boxelder Maple, Japanese Cedar and Olive trees.
- There will be no retention of species identified in the RPMP.



An artist impression of native restoration of Ōtāhuhu / Mount Richmond

## ŌTĀHUHU\_/ MOUNT RICHMOND

To achieve the cultural, spiritual and ecological restoration of  $\underline{\bar{O}}$ tāhuhu / Mount Richmond,  $\underline{\underline{Te}}$   $\underline{\underline{Tatua}}$ -a-Riukiuta / Big King\_a a WE7\_Pūriri ngāherengahere forest type will be planted as a representation of the forests that stood on  $\underline{a}$  n  $\underline{d}$ /or near the  $\underline{\underline{Maunga}}$ . Key components of the native restoration programme are::

 $\underline{A\ minimum\ of}\ 39,000\ native\ plants\ will\ be\ planted\ on\ the\ Maunga\ (of\ which\ 12,000\ have\ already\ been\ planted\ and\ are\ maturing\ well).$ 

Culturally significant species will be planted to ensure that cultural traditions such as whakairo, raranga, and rongoa collection can-continue into the future.

Habitats for mokomoko and other native fauna will be restored.

Pest control will be intensified over time to ensure the protection of the continuous ngāherengahere established near the tihi.

All native trees will be retained.

Approximately <u>A maximum of 443 non-native trees\_and-shrubs-(not all)</u> will be removed, including-weed-species-identified in the RPMP.

### THE METHODOLOGY OF THE PROGRAMME WILL INCLUDE:

- · Retaining the tihi in grass and native species.
- Planting in areas where in situ archaeology has been destroyed by historic quarrying.
- Selecting appropriate plants that can be planted near archaeological features.
- Removing trees in a way that avoids ground disturbance and has minimal impact on archaeological features.
- Ensuring that all trees that present a health and safety risk <u>and/or are pest</u> <u>plants identified in the RPMP</u> are removed.

## Retention of selected existing non-native trees

- Tree types to be confirmed for retention include mature, healthy, and significant examples of London Plane, English Oak, She-Oak and Olive trees.
- There will be no retention of species identified in the RPMP.



An artist impression of native restoration of Te Tātua-a-Riukiuta / Big King

Integrated Management Plan 111

## TE TĀTUA\_A\_RIUKIUTA / BIG KING³

To achieve the cultural, spiritual and ecological restoration of Te Tātua-a-Riukiuta\_/ Big King a WF7 Pūriri ngāherengahere forest type will be planted as a representation of the forests that stood on <a href="mailto:and/or near">and/or near</a> the Maunga. Key components of the native restoration <a href="mailto:programme are:">programme are:</a>

A minimum of 9,000 native plants will be planted on the Maunga.

Culturally significant species will be planted to ensure that cultural traditions such as whakairo, raranga, and rongoa collection-can continue into the future

Habitats for mokomoko and other native fauna will be restored.

Pest control will be intensified over time to ensure the protection of the continuous <a href="mailto:ngāherengahere">ngāherengahere</a> established near the tihi.

All native trees will be retained.

Approximately A maximum of 197 non-native trees and shrubs (not all) will be removed, including weed species identified in the RPMP.

### THE METHODOLOGY OF THE PROGRAMME WILL INCLUDE:

- Retaining the tihi in grass and native species.
- Planting in areas where in situ archaeology has been destroyed by historic quarrying.
- Selecting appropriate plants that can be planted near archaeological features.
- Removing trees in a way that avoids ground disturbance and has minimal impact on archaeological features.
   Ensuring that all trees that present a health and safety risk <u>and/or are pest plants</u> identified in the RPMP are removed.

### Retention of selected existing non-native trees

- Tree types to be confirmed for retention include mature, healthy, and significant examples of Japanese Cedar, English Oak and Silky Oak.
- There will be no retention of species identified in the RPMP.

An Artist impression will be included when available