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regionalparksplanreview@aucklandcouncil.govt.nz

Re: Draft Regional Parks Management Plan

I am writing on behalf of the Waitākere Ranges Protection Society (WRPS) to submit on the Draft Regional Parks Management Plan.

Background on the WRPS

The WRPS was incorporated in 1973. Its purpose is the conservation and protection of the Waitākere Ranges to oppose any activity that may threaten or adversely affect the natural environment in the area.

WRPS and its members are strong advocates for the conservation and protection of the natural environment of the Waitākere Ranges and WRPS was one of the key groups promoting the concept of the Waitākere Ranges Heritage Area (WRHA) for 35 years before it was achieved through an Act of Parliament in 2008.

General comment

The Waitākere Ranges Heritage Area is of local, regional and national significance due to its unique heritage features, which include the prominent indigenous character of its terrestrial and aquatic ecosystems.

WRPS strongly advocates the importance of preservation of the Waitākere Ranges due to its significance as a protected Heritage Area and as an outstanding natural landscape. WRPS believes maintaining high levels of naturalness, integrity of the landscape, and the continuance of the important biodiversity the Heritage Area is

home to requires protection from development and the proper management of visitor numbers.

Waitākere Ranges Heritage Area Act 2008

Preservation of the natural character of the coastal environment and the protection of outstanding natural features and landscapes from inappropriate development are the basis of s 6(a)(b) of the RMA 1991. Specific to the Waitākere Ranges area we strive to ensure adherence to the Waitākere Ranges Heritage Area Act 2008. The Heritage area objectives are laid out in Part 2 (s8) and must be respected throughout the composing of the new RPMP;

- (a) to protect, restore, and enhance the area and its natural features;
- (b) to ensure that impacts on the area as a whole are considered when decisions are made affecting any part of it;
- (c) to adopt the following approach when considering decisions that threaten serious or irreversible damage to a heritage feature:
 - (i) carefully consider the risks and uncertainties associated with any particular course of action; and
 - (ii) take into account the best information available; and
 - (iii) endeavour to protect the heritage feature
- (f) to ensure that any subdivision or development in the area, of itself or in respect of its cumulative effect, –
 - (i) is of an appropriate character, scale, and intensity; and
 - (ii) does not adversely affect the heritage features

The Waitākere Ranges Heritage Area is not just the Regional Park, but the cultural, social and economic elements of the community, as well its local parks, beaches and built areas. The significant heritage features of the Waitākere Ranges Heritage Area include:

- (i) the individual identity and character of the coastal villages and their distinctive scale, containment, intensity, and amenity; and
- (ii) the distinctive harmony, pleasantness, and coherence of the low-density residential and urban areas’.

The Waitākere Ranges Heritage Area Act clearly states that among the Heritage Features (s7 (B)) of the area are:

- (g) the opportunities that the area provides for wilderness experiences, recreation, and relaxation in close proximity to metropolitan Auckland
- (m) the Waitākere Ranges Regional Park and its importance as an accessible public place with significant natural, historical, cultural, and recreational resources.

Executive summary

The Waitākere Ranges is subject to the requirements of the Waitākere Ranges Heritage Area Act 2008 (WRHAA). This act created a distinct statutory identity for the heritage area, of which the regional park makes up 60 per cent. It recognises the ranges' national, regional and local significance, and it promotes the protection and enhancement of the area's heritage features for present and future generations.

The WRHAA sets out specific requirements over and above other legislation and the general policies in this draft Plan.

When preparing, adopting, and maintaining that Plan, Council must give effect to the purpose and objectives of the WRHAA (s 19(2)).

From page 198 of the 2022 draft plan

The purposes and objectives of the Waitākere Ranges Heritage Area Act 2008 must be promoted in the new RPMP.

The Waitākere Ranges is a heritage area, the Waitākere Ranges Heritage Area Act 2008 exists to protect this natural landscape and for it to remain an undeveloped natural landscape.

The RPMP 2010 (s10.1) stated the intention of this section (s10) is to ensure these qualities (high scenic qualities, wilderness, remote experience) are not destroyed by development on the parks or development on adjacent land.

WRPS requests to see this same strong intention in the new draft plan.

WRPS strongly supports the continuance of the entirety of the Waitākere Ranges parkland being classified as a "Class 1(a)", with emphasis being on preservation and protection of the natural landscape.

It is crucial that the Waitākere Ranges remains a less developed regional park, and a predominantly natural landscape providing for low impact recreation opportunities only where possible and only that which require minimal infrastructure, with limited group activities and no large scale events – as it is classified in the RPMP 2010. WRPS acknowledges the need to manage visitors to the Waitākere Ranges sustainably. WRPS strongly believes however that it is more important to put the preservation and protection of the Waitākere Ranges before visitor experience.

WRPS requests:

- a stronger vision for the draft RPMP;
- a complete rejection of the class 1b classification of the parkland of the Waitākere Ranges;
- a prioritisation of the protection of the wilderness experience the Waitākere Ranges provides; and
- the range of activities permitted in the Waitākere Ranges Heritage Area parkland continue to exclude those activities currently prohibited, such as mountain biking, horse riding and motorised sports.

Key submission points (for further detail see Specific Submissions below):

- The vision for the draft RPMP of the Waitākere Ranges Regional Park needs to be more robust and to emphasise protection of its wilderness values. See our proposed Vision statement below.
- WRPS submits that the entire Waitākere Ranges Regional Park is managed as a Class 1(a) park recognising its heritage, ecological, wilderness and recreational values and its national significance under the Waitākere Ranges Heritage Area Act 2008.
- WRPS rejects the introduction of Class 1b status for parts of the Waitākere Ranges Regional Park as this is contrary to an integrated management approach, and will result in over-development of these areas and the loss of wilderness values. See more in specific submissions below.
- WRPS rejects extension, sealing and marking up of car parks in the Waitākere Ranges Regional Park.
- WRPS rejects the designation of 1b for the Hillary Trail
- WRPS rejects the notion that the Hillary Trail should be developed to Great Walk standard, which will result in the trail being over-developed and over-used and put undue pressure on the environment and on settlements along the Hillary Trail which already experience high visitation numbers.
- WRPS calls for a review of the way Auckland Council is implementing the *MPI National Kauri Dieback Track Infrastructure Guidelines (1/7/19)* and the *MPI Kauri Dieback Disease Management National Technical Specification for Track Mitigation Measure Rev C 6/9/2019* to protect kauri dieback, with concern that extensive track upgrades are sanitising the Waitākere parkland and undermining its wilderness values.
- WRPS supports the development of a recreation/track network plan for the Waitākere Ranges Regional Park, but call for it to take place as part of this review of the RPMP and not be delayed as proposed.
- WRPS calls for delaying the finalisation of the Draft RPMP for the Waitākere Ranges Regional Park until the recreation/track plan is developed, the track upgrading is reviewed, including significant consultation with stakeholders and the community.
- WRPS wants Auckland Council to ensure that the results of the kauri dieback survey (being carried out for Auckland Council by Massey University) and the *Phytophthora agathidicida (Pa)* [kauri dieback] National Pest Management Plan are available to inform the review of the RPMP, including the opportunity for submitters to comment.
- WRPS supports the retention of the ranger service to manage regional parks and seek that the number of rangers is increased to pre-amalgamation levels, and even higher, given the growth in the population of Auckland, environmental threats and the greater need for access to outdoor spaces

demonstrated during the pandemic.

- WRPS opposes the qualification of the “management intentions” in the Plan with the repetition of the words “subject to resourcing being available”. Call for a budget to be developed as part of this review to show how and when actions included in the Plan will be funded.
- WRPS supports continuing to exclude mountain biking from the Waitākere Ranges Regional Park (page 103).
- WRPS opposes provision for 4WD within the Waitākere Ranges or its beaches.
- WRPS opposes provision for dirt bike/motorbike riding within the Waitākere Ranges Regional Park.
- WRPS opposes set netting from regional parks.
- WRPS supports continuation of regional parks as Smoke-free (para 156) and support addition of vape-free.
- WRPS supports policy of “Pack in, Pack out” for waste (Objective 55, page 110).
- The Draft RPMP states that: “As a rule, car parking for private vehicles should not be increased....” (page 72) but then goes on to propose maximising car parking at many places in the Waitākere Ranges. WRPS opposes maximizing car parking throughout the Waitakere Ranges.
- WRPS opposes charging for entry; this should not be used to manage demand. This would inequitably penalise those on low incomes and is contrary to the reasons the regional parks were acquired and who paid for them in the first place.
- WRPS are also concerned that the closing date for submissions being March 4th does not allow Auckland Council to include the results from the Kauri Dieback Survey, due in April 2022. The Kauri Dieback Survey will give Auckland Council sound science with regard to tramping tracks in the Waitākere Ranges.

Specific submissions

In its notified form the draft RPMP is contrary to the Waitākere Ranges Heritage Area Act 2008 (“Act”) and fails to give effect to the purpose and objectives of the Act.

Vision:

The 2010 vision for the park was:

“A regional conservation and scenic park that is managed to protect and enhance its unique natural, cultural and historic values and wilderness qualities; to provide a place of respite for the people of Auckland, to provide for a range of compatible recreational activities in natural settings, and to cultivate an ethic of stewardship.”

The proposed new vision from the 2022 draft:

“A heritage area of national significance and taonga where the mauri is restored and the heart of the ngahere protected, appropriately accommodating growing visitor numbers by providing for compatible opportunities on the fringes of the park.”

Suggested vision:

A regional conservation and scenic park that upholds the vision and the values of the Waitakere Ranges Heritage Area Act 2008 and that is managed to:

- protect and enhance its unique and nationally significant natural and cultural heritage values for their intrinsic worth and for the benefit of present and future generations;
- to recognise the mana of the area and the mauri of the environment;
- to provide a place of respite and recreation for the people of Auckland while preventing adverse effects on its terrestrial and aquatic ecosystems;
- to give effect to the traditional and cultural relationship of tangata whenua with the area and their exercise of kaitiakitanga, and to promote an ethic of stewardship.

The new 1a and 1b classifications:

From Visitor Pressures, page 205:

“A strong message from the first round of consultation on this review was the park needs to be managed in a way that protects its natural, cultural, and landscape qualities, quietness and wilderness values, and also provide for the wellbeing of distinct communities in the area, while also recognising the importance of the park as an accessible public place.”

“Careful management is required to recognise the type, intensity and distribution of activity on the park and ensure the pressure of use does not destroy the very qualities people value about the park.”

Many areas of the Waitākere Ranges are proposed to be in “Category 1b: Destination”.

This category is focussed on recreation and development for visitors to access the park. WRPS is concerned that 1b will in fact mean management in a way that does not protect the natural and landscape qualities, and in particular the quietness and wilderness values.

These 1b areas will have:

“Higher level of infrastructure and development to cater for the park (or part) being a major visitor destination. Vehicle access, car parks may be larger. Expected facilities: gravel-based or sealed car parks, information boards, toilets, picnic areas, vehicle-accessible campground and in some locations accommodation (baches) and bookable sites. Tracks are generally developed and maintained to short walk or walking track standard. Some may cater for people with mobility difficulties.” (Draft RPMP, page 31)

WRPS requests that category 1b be removed altogether from the plan for the Waitākere Ranges Heritage Area.

We want the entirety of the Waitākere Ranges Heritage Area to be Category 1a (as it is now), recognising its heritage, ecological, wilderness and recreational values and its national significance under the Waitākere Ranges Heritage Area Act, passed into law by Parliament in 2008.

Submissions on specific areas:

- Anawhata SMZ: Include overall intention from 2010 plan: “Manage Anawhata as a remote experience area with a small gravel carpark, toilet, and directional signs.” Undertake pest plant control and pest animal control; implement better measures around dog control. Ensure road access remains unsealed in order to preserve remote quality of the area.
- Arataki: Maintain as part of Class 1a park, delete reference to 1b. maintain Arataki as a Special Management Zone.
- Cascades Kauri/Ark in the Park SMZ; maintain as Class 1a park, delete 1b reference.
- Cornwallis SMZ, maintain as Class 1a, delete reference to 1b. Support removal of wilding pines from Puponga Point and protection of penguins and grey-faced petrels.
- Kakamatua SMZ: maintain as a Class 1a park, delete reference to 1b. Undertake pest plant control on invasive weeds in the Kakamatua wetland and on the fire site above the beach, particularly pampas, gorse and wilding pines.
Upgrade dog control through the reserve and on the beach at Kakamatua. Dog faeces are a huge problem and dogs are constantly off-leash through the reserve, risking kauri dieback spread and likely disturbing nesting birds. Support the intention to provide dog-walking options in other locations to

reduce demand here. Improve signage about dog control and work actively with Dog Control to enforce rules.

- Karekare: maintain as a Class 1a park, and Special Management Zone and delete reference to 1b; restore dune systems and control lupins, oppose sealing car park, access to beach is currently available on south side of stream without the need to cross the stream, as wrongly stated on p 217, support keeping Pohutukawa Glade free of car parking, any changes to car parking at the beach or falls must involve significant consultation with the community.
- Lake Wainamu: maintain as a Class 1a park and Special Management Zone and delete reference to 1b. Under management intentions; reject: “82. Work with Auckland Transport to review options to maximize the capacity of car parking” and replace with “Meet with Auckland Transport to make present carpark safe and efficient. Present carpark meets reserve capacity”. Add “explore options for toilet at beginning of track”. Reword 84 to require Council to “implement an integrated pest plant control programme and revegetation of the riparian margins”.
- Mercer Bay Loop Walk and lookouts (Piha): Maintain as Class 1a park, and Special Management Zone and delete reference to 1b. Oppose any new tracks through the scheduled Radar Station site.
- Te Waha Point/ North Piha SMZ: Maintain as a Class 1a park and delete reference to 1b, install public toilets, protect penguins and grey-faced petrels by discouraging people from going near places they are known to nest on Te Waha point, the caves, the cliffs behind the grassed picnic area next to the car park; provide better signage about dog rules.
- Lion Rock – Piha SMZ. Maintain as Class1a park, delete reference to 1b. Remove pest plants, particularly agapanthus.
- Pararaha Valley SMZ: manage as a remote wilderness area, with limited infrastructure; oppose a new hut.
- Pukematakeo lookout (Scenic Drive) SMZ: Maintain as Class 1a, delete reference to 1b.
- Taitomo: Take into consideration the Taitomo Variation; prioritise restoration before track building; prioritise the mitigation of fire risk; ensure water is available to fire-fighting; do not widen the track beyond current width to protect the area’s wilderness values; notify the resource consent application for the Taitomo Track to ensure the community can comment on it; move the boardwalk from the herb field to behind the herb field; move the track to between the herbfield and the blowhole from the top of the blowhole; remove built steps into the Blowhole; install further dog prohibition signage to protect

wildlife.

- Te Ara Tuhura/the Hillary Trail SMZ: Maintain as a Class 1a park, delete reference to 1b; oppose trail being upgraded to Great Walk Standard as this undermines agreements with local communities since its inception; oppose commercial concessions on the track except for transport providers, those providing youth education programs, as at present, and with the addition of mana whenua cultural concessions. Note; commercial concessions are inconsistent with the legal requirements of a Scientific Reserve which the trail passes through at Whapitu.
- Wai O Kahu/Piha Valley: maintain as Class 1a, and Special Management Zone and delete reference to 1b; oppose “maximizing car parking within the current footprint if it means more parking on the Piha Mill Camp site on the north side of Piha Stream; oppose any further bridges across Kitekite Stream, in particular any “Selfie Bridge” at the falls; protect and provide interop of the large eels in Piha Stream.

Whatipu Scenic Reserve SMZ; maintain Whatipu as a Class 1a park, delete reference to 1b. Urgently undertake pest plant control to protect the wetland systems and Whatipu Scenic Reserve, with emphasis on implementing the Regional Pest Management Plan. This should not be “subject to resourcing being available”. Reroute the Hillary Trail out of the Scientific Reserve as it is inconsistent with the designation under the Reserves Act.

What is missing from this review:

What is proposed in the Draft RPMP is that the Waitākere Ranges tracks network will be reviewed in the future through a “proposed recreation plan/track network plan” (page 204 and pages 209-10). The Draft RPMP does not put a date on this and says such a plan is “subject to resourcing being available” (page 208). The Draft RPMP says such a plan will consider “rationalising the track network and reducing the number of track entrances, particularly those off the side of busy roads with insufficient or unsafe parking” and “the provision of safe parking areas near track entrances” (page 210). The review will also consider “the range of activities appropriate across the track network” (page 210).

The place for this kind of review should have been this review of this plan. There is no explanation as to why this is not included in this review of the RPMP as was intended and as it should have been. It is not acceptable to be developing something as important as a recreation/track plan for the Waitākere Ranges outside the statutory framework of this review.

There are also two other documents that should be considered as part of this review. They are the survey of kauri in the Waitākere Ranges Regional Park that is being carried out by Massey University for Auckland Council, and the Pa [kauri dieback] National Pest Management Plan due to be released by MPI in April 2022.

The previous RPMP 2010 sought to implement “travel demand management”: “to advocate for increased [public transport] services to popular destinations, including visitor centres”. (RPMP 2010, 8.3.1, page 49). It seems this has not been actioned. The serious issue of insufficient parking at popular destinations and gateway areas must be urgently addressed and is not to create more car parks, but to provide public transport options. Places unused in the weekend, with lots of parks such as schools could be utilised as parking hubs with shuttles running all day. Aucklanders with no private motor vehicle cannot access many of these areas, and this is inequitable. Either a public service or a public-private partnership can provide shuttles to those areas where visitors typically spend several hours on a walk and/or picnic experience, such as Karekare, Piha, Cornwallis, Arataki and others. Such services provide dual value where there is currently no public transport to service residents despite continual requests to Council. We query the suggestion that previous trials have shown that such transport would not be used. If such a scheme is promoted properly and people actually know about it, it will be used.

Conclusion

The purpose and objectives of the Waitākere Ranges Heritage Area Act 2008 must be promoted in the management plan for the Waitākere Ranges Heritage Area.

As the largest regional park (17,000 ha), the oldest regional park, the foundational park of the regional parks’ network, and with its proximity to the most populated part of the Auckland region, the Waitākere Ranges parkland warrants special attention and faces particular challenges from kauri dieback and over-use.

The Waitākere Ranges as a place of natural heritage value should remain as that in the RPMP. It is an invaluable place of biodiversity and must be protected and maintained. It is critical that the new RPMP does not deviate significantly from the values and management focus that were established in the 2010 plan which set a benchmark of public interest and ownership, environmental and landscape protection, and did not promote tourism/commercialisation.

We would like to request to speak to and present this submission.

Yours sincerely,

A handwritten signature in black ink that reads "Anna Maria Fomison". The signature is written in a cursive, flowing style.

Anna Maria Fomison
President
Waitākere Ranges Protection Society