

Draft Regional Parks Management Plan

Consultation closes 4 March 2022

Hearings in May, Revisions June-August 2022 before adoption by Governing Body

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This is a 10 year plan which is highly important to the Waitakere Ranges and communities within it. The Plan is in two parts: generic policy, and specific park policies. What I have done is concentrate on the Waitakere Ranges Regional Park part of the proposed plan. There are 3 parts to my response

1. Key submission points for the whole Waitakere Ranges parkland
2. Discussion of why these submission points are important
3. Area by area comments with submission points for each where appropriate. I am providing this in a 2nd document.

Feel free to use, borrow, restate any parts of this in your submission. My analysis will be stronger in parts of the parkland I know best. I urge you to read the part for the area you know and put in submissions.

Throughout these documents the existing Regional Parks Management Plan will be referred to as RPMP 2010 and the draft Regional Parks Management Plan will be called Draft RPMP.

Send your submission to: regionalparksplanreview@aucklandcouncil.govt.nz

There is also a feedback form:

https://akhaveyoursay.aucklandcouncil.govt.nz/regional-parks-management-plan/survey_tools/feedback-form

There will be hearings in May 2022 so make sure you state if you wish to speak at a hearing.

This analysis does not claim to identify and address every issue that might arise through the Draft Plan. Please read it yourself. Also read the appendices and the maps.

<https://akhaveyoursay.aucklandcouncil.govt.nz/58355/widgets/297783/documents/221822>

1. Key submission points

- Rewrite the vision for the Waitakere Ranges Regional Park to emphasis protection of its wilderness values and the opportunities it provides for the people of Auckland to seek respite in nature.
- Manage the entire Waitakere Ranges Regional Park as a Class 1 park (as it is now), recognising its heritage, ecological, wilderness and recreational values and its national significance under the Waitakere Ranges Heritage Area Act 2008.
- Reject the introduction of Class 1b status for parts of the Waitakere 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.
- Reject sealing and marking up of carparks in the Waitakere Ranges Regional Park.
- Introduce a shuttle bus service to track entrances to enable people to access the parkland by means other than private cars, thus addressing climate change and avoiding the need for expanded carparks.
- Support the retention of Special Management Zones (SMZ) as locations that need special care, and seek the reinstatement of caps on certain activities as contained in the RPMP 2010.
- Reject the designation of 1b for the Hillary Trail
- Reject 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.
- Call 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 Waitakere parkland and undermining its wilderness values.
- Support the development of a recreation/track network plan for the Waitakere Ranges Regional Park, but call for it to take place as part of this review of the RPMP and not be delayed as proposed.

- Delay finalisation of the Draft RPMP for the Waitakere Ranges Regional Park until the recreation/track plan is developed, the track upgrading is reviewed, including significant consultation with stakeholders and the community.
- 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.
- Call for no further permanent track closures at this time and place a moratorium on permanent track closures until the science of kauri dieback is better understood.
- In the meantime, manage closed tracks by controlling pest plants and vegetation so that the tracks can be re-opened when possible.
- Oppose charging for entry to parks or tracks as a tool of demand management. Oppose making some tracks one-way as a tool of demand management (page 112).
- Support 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.
- Do not support the proposed accommodation offer review as it is not necessary. The actions proposed at para 20 (page 210) can be reviewed as part of the current review.
- Oppose 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.
- Support an Order in Council for those parts of the Waitakere Ranges Regional Park not already covered by one, to protect that parkland in perpetuity (applies principally to Taitomo Block Piha).
- Identify scheduled heritage sites within the written part of the plan and also on the maps.
- Identify notable trees within the written part of the plan and also on the maps.
- Include a list of heritage sites and notable trees in the Plan.

- Reinstate and fund the Rock Fishing Safety Programme. Continue to provide angel rings at key rock fishing locations. Promote the extension of this programme to the Manukau Harbour.
- Continue to exclude mountain biking from the Waitakere Ranges Regional Park (page 103).
- Oppose provision for 4WD within the Waitakere Ranges or its beaches.
- Oppose provision for dirt bike/motorbike riding within the Waitakere Ranges Regional Park.
- Oppose set netting from regional parks.
- Support continuation of regional parks as Smokefree (para 156) and support addition of vape-free.
- Support policy of “Pack in, Pack out” for waste (Objective 55, page 110).

2. Waitakere Ranges Regional Parkland – vision and class

The Draft Regional Parks Management Plan proposes a profoundly different vision for the Waitakere Ranges Regional Park than the previous Plan or indeed what might be called “the founding vision”, the Auckland Centennial Memorial Park Act 1941.

That Act sought to protect the scenic, conservation and recreational values of the parkland.

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

“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.”

This new vision excludes the notion of “wilderness” which has always been fundamental to the Waitakeres Ranges parkland, and relegates the people of Auckland to the “fringes” of the parkland. Neither does it capture the concept of people finding “respite” in being in the natural world, an escape from the city where wild nature restores the spirit.

The rest of the section on the Waitakere Ranges parkland expands on the new vision. What is envisioned is a forested park which is closed off to the public, with a highly constructed Great Walk standard trail along the Manukau Harbour and Tasman Sea coastal edges that would accommodate high visitor numbers and commercial activity. The trail route is that of the Hillary Trail which the previous Plan stated should not be upgraded to Great Walk

standard but be a challenging trail for people of moderate fitness. The former plan also opposed commercial concessions except for transporting people or for young people doing adventure courses.

These restrictions were consistent with consultation with coastal communities during the creation of the Hillary Trail. Communities and stakeholders said they wanted the tracks to remain at their existing standards and they did not want ordinary members of the public competing with paid tourists on the walk.

The vision of an upgraded, commercialised trail is also seen in other changes in the proposed plan. The Waitakeres is, and always has been, a Class 1 park, which meant in the RPMP 2010, “a wilderness experience in a predominantly natural landscape” and “emphasis on protection of the natural and cultural environment and scenic landscapes” and “informal recreation activities requiring little infrastructure” (page 21, RPMP 2010).

The 2010 RPMP created Special Management Zones or SMZs which were places with special features, sensitive environments or high visitor numbers. SMZs required special care including some caps or limits on activities. This was to ensure popular destinations did not get “loved to death”. Many parts of the Waitakere Ranges parkland are SMZs.

In the new draft plan, SMZs are retained, with much the same policies, although the caps have gone. However, the big difference is that the Waitakere Ranges parkland is now divided into Classes 1a and 1b:

“Category 1a: Natural and Cultural: These parks focus on protecting park values and offer a remote or wilderness experience, allowing only low levels of use and development to minimise the effects of visitor activity.”

Most of the interior parkland is 1a which now introduces the notion of “low levels of use”. But many parts of the Ranges are now allocated the new park Class – 1b – “destination arrival areas” where greater infrastructure is proposed and the wilderness is presumably, absent. This particularly takes the form of maximising carparking which includes sealing carparks and marking parking spaces on the ground.

“Category 1b: Destination: This new sub-category of Category 1 recognises that some parks with high park values also experience high visitor numbers. These parks need more intensive management and monitoring of the visitor experience and the potential impacts on park values.”

Category 1b are Arataki, Cascade Kauri/Ark in the Park, Cornwallis, Fairy Falls and Spraggs Bush, Karamatura, Karekare, Lake Wainamu, Mercer Bay Loop Walk and lookouts (Piha), North Piha, Pukematakeo Lookout (Scenic Drive), Hillary Trail (Te Ara Tuhuru), Wai o Kahu (Glen Esk, Piha Valley) and Whatipu (excluding Scientific Reserve).

What differentiates the 1b Category from SMZs, is that whereas the SMZs aimed at protecting the park’s values – in effect, “holding the line”, 1b seeks to expand and develop. The intention is to develop these 1b parts of the parkland with more structured and “built”

elements and more “easy walks”, a kind of “vanilla Waitakeres” within the larger wilderness of the parkland from which people are by and large excluded. 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 board, 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)

A clue to the intention behind 1b is found in the section on the Hillary Trail. There it states that “The entire length of the trail is categorised as 1b” (Draft RPMP, page 226)

Why? One is drawn to the conclusion that a Great Walk-standard Hillary Trail is to be developed and promoted as the prime visitor focus of the Waitakere Ranges – the Tongariro Crossing of the Waitakeres. While people are shut out of the great Waitakere forest, they are to be corralled onto the Hillary Trail, which will not only accommodate over-nighters, but also day visitors and concessionaires.

This would explain why the coastal tracks (part of the Hillary Trail) are already being upgraded to such a high standard, with wooden steps, board walks and level gravelled paths, and why these tracks have been proofed against kauri dieback when often they do not contain kauri. Paths such as Comans Track and Whites Track – with one or two kauri a piece (which could have been avoided by minor re-routing) – have been fully upgraded end-to-end. The Marawhara Walk at Piha has no kauri, but as part of the Hillary Trail has been upgraded.

One of the things that is difficult in responding to this Draft RPMP is that relevant policies are scattered through the Plan, or are to be found in other documents. Buried in “Appendix 4 Tracks” is to be found information that illuminates further what the 1b actually means. This introduces the concept that 1b areas are “hubs”, with drawcards for visitors: short walks, loop walks, “showcasing” destinations/features. 1b areas are proposed as places to which to attract people for packaged/managed experiences. Rather than the Waitakere Ranges Regional Park being a place where people can explore and discover wild nature for themselves, they will be managed into visitor hubs where there will be highly structured short walks to key beauty spots with interp signs explaining what they are looking at.

The idea of 1b is more akin to the legacy Waitakere City Council’s notion of “skite sites” which it tried to introduce a decade ago and was fought off by the community. The idea that high visitor numbers should be avoided and management aimed at controlling numbers seems to have been abandoned, but it is hard to see how people can enjoy “wilderness” or “respite in nature” in sites over-run with people.

This is what the Draft RPMP actually says in Appendix 4 that a 1b location should look like:

“5. ...”plan a network of short (up to 1 hour) and half-day walking (up to 3 hours) opportunities around hubs prioritising parts of the regional park that are Category 1b

and which have the following characteristics: a. At least one short walk showcasing a natural or historic feature or destination (e.g. waterhole, viewpoint) that typifies that part of the park. b. Access to streams and natural waterholes for swimming and water play at a range of destinations. c. Where longer linear track systems only exist at Category 1b hubs, investigate as a priority, opportunities to develop return loops that create interest and different viewpoints for visitors and reduce the risk of congestion and crowding. d. New short walks should only be developed as return loops rather than linear ('there and back') tracks. e. Where return loops are not feasible, identify and integrate into track design, natural or historic features or destinations that provide a logical and satisfying turnaround point for visitors. f. Consider the existing carrying capacity of trail heads and carparks (including alternative locations) in determining the location of hubs within regional parks. g. Prioritise barrier free short walks from category 1b hubs that have sealed road access and the ability to create a destination that has all access facilities (e.g. toilets, carparks) which can cater for visitors with limited mobility and children's strollers or mountain buggies."

If this sounds more like a visit to the Botanic Gardens, you are right.

3. Track Closures/Kauri Dieback

In April 2018 the Council voted to close the forested parts of the Waitakere Ranges to enable work to take place to respond to the threat of kauri dieback, which was first seen in the parkland in 2006 and in the interim had appeared in a number of other parts of the park. Tracks were closed and a Controlled Area Notice placed over much of the park by the Ministry of Primary Industries (MPI). In 2019 the Council consulted the public about which tracks should be prioritised for reopening.

Unfortunately, this consultation was carried out without any policy framework around it, so became simply a popularity poll of tracks. There was no coherent approach or overall goal for the programme. There was no statement of what the Waitakere Ranges parkland would look like at the end of the process nor how people would use it.

The *Track Reopening Work Programme 2019-2024* simply lists tracks as to whether they will be upgraded, "investigated for future inclusion" or "not included in the 2019-2024 work programme". There are 33 tracks that were to be reopened after they were upgraded, 36 that would remain open, 46 tracks were not included in the programme and 9 were permanently closed.

According to the Work Programme the future of the 46 tracks that were not included in the programme "will be considered as part of the Regional Parks Management Plan review in 2020" (*Track Reopening Work Programme 2019-2024*, page 13), but this has not occurred. The fate of the 46 tracks is not included in the Draft RPMP.

We seem to be drifting into a scenario where these tracks will be permanently closed by default. Neither is it clear how the closed tracks are currently being managed. Are they being maintained pending future reopening, or have they been left to become vegetated and/or weedy, in which case, the likelihood of them ever being reopened is severely compromised?

What is proposed in the Draft RPMP is that the Waitakere Ranges tracks network will be reviewed in the future through a “proposed recreation plan/track network plan” (page 204 and pp 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, not some future non-statutory process. 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 Waitakeres 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 Waitakere 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.

4. Track Standards

The Draft RPMP introduces a new track standard regime. Previously there were 4 track types: paths, walking tracks, tramping tracks and routes. This plan adds “short walk” and “easy tramping track” which are categories taken from Standards New Zealand *Tracks and Outdoor Visitor Structures HB 8630:2004*. It is not clear what these additions mean for the tracks in the Waitakeres.

The maps that are part of the proposed plan do not show the proposed track types on the ground but in discussing the Class 1b parks, it is stated that tracks from those locations will be “short walk” or “walking track”. It is not clear whether this means there will be a further upgrading of tracks within these areas or new tracks will be built. A scenario emerges from the Draft RPMP that people will be directed to the 1b “hubs” where they will take a short walk to a lookout or destination feature, come back and have a picnic. All quite pleasant but its really like the Botanic Gardens again. Where is the opportunity for people who want something more challenging or who want to venture into the unknown on their own journey of discovery?

In discussing track standards, the Draft RPMP does **not** include the “Great Walk” standard, but this is later proposed for the Hillary Trail. Great Walk standard is similar to Easy Tramping Track in the *SNZ HB 8630:2004*.

Great Walk includes the following:

- No maximum grade
- Steps gradient no more than 1 in 1.2
- Maximum vertical rise between landings 4 m
- Maximum width of tracks 1 m
- Over 70% of track length shall have wet areas drained and a surface that provides a firm footing
- Up to 30% of track length can have rough, steep and uneven sections
- Up to 30% of track length can have deep muddy wet sections as long as mud doesn't come over boot
- Boardwalks only if essential
- Major watercourses will be bridged
- Minor watercourses will be bridged (various criteria incl can't be safely crossed in flood)
- Ladders may be used though not more than 2 m in length
- Guardrails when significant hazard
- No viewing platforms
- No seats or picnic tables
- Vegetation clearance to 0.5 m on either side of centre of track.

This is less structured than what regional parks has proposed in its Taitomo leg of the Hillary Trail, which is 1.2 metres width for most of the route and avoids steps by constructing a wide zig-zag down the hill.

Clearly the way the tracks have been upgraded for kauri dieback (eg Omanawanui Track) involves far greater built structures than the Great Walk standard in itself.

The upgrading of tracks that many of us find so upsetting is the result 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*.

These are extremely proscriptive about how to protect kauri from track users, but even then, Auckland Council has often chosen built options when rerouting might have been sufficient and has gone for a track end-to-end upgrade approach when less might have been enough.

This is the place to call for a review of how Auckland Council has been implementing these guidelines and specifications.

5. Access to Parks

While the Draft RPMP has a section on “Sustainable management and climate change”, it is inadequate on how to reduce emissions. It acknowledges that most parks are accessed by private vehicle, and that this contributes to vehicle traffic, emissions and expansion of carparking. It argues for enabling access by other means such as “walking, cycling, public and group transport and carpooling, working with Auckland Transport where relevant” (Draft RPMP, page 71).

The Waitakere Ranges Regional Park can only be accessed by private vehicle or on foot for those living within the park. It is not really feasible to access the park by bike, as most access points are from the open road. This necessitates carparks, and it means that those without a car cannot access the park at all, as there is no public transport.

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 carparking at many places in the Waitakeres.

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 Draft RPMP is discouraging about public transport to parks saying “previous trials of public transport to some regional parks have shown that this is unlikely to attract large numbers of regular users” (page 71).

The Waitakere Ranges Local Board has worked with Auckland Transport to develop shuttle bus services to Piha and Huia, but the funding for this service was not forthcoming.

Such a shuttle bus service could serve both residents and park visitors. Or, regional parks could establish such a service using vans specifically for the purpose or partner with a private provider to do so. This could take visitors to Arataki and other entry points to the parkland. Such a service should be costed and trialled if the Council is serious about climate change and accessibility. The cost of such a service should be set against the cost of sealing and expanding carparks.

6. Demand Management Tools

Chapter 11 at page 134 deals with ways on cutting down on numbers at popular sites. While a number of these tools are sensible, there will be concern at proposals to make some tracks one-way, to require people to book for use of tracks, and to propose fees and changes.

For the Waitakere Ranges Regional Park, and for other regional parks, the central principle of any Aucklander being able to enter and walk in park without cost is paramount. Of course there will be times when parks or parts of parks are closed, but charging for entry 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.

7. Ranger Service

The RPMP 2010 emphasised the Ranger Service by providing a specific section in the Plan where the importance of the rangers managing the park was emphasised:

“The regional parks network has traditionally been managed using park rangers. This is one of the features that set Auckland’s regional parks apart from many other park services”(RPMP 2010, page 109).

The Draft RPMP does not do this. The section on defining regional parks contains the following statement:

“Regional parks are hosted by park rangers, providing a distinctive and much appreciated service. Rangers interact with visitors and lead conservation efforts”(Draft RPMP, page 9).

It is not clear what “hosted” means as distinct from “manage”. There is also a worrying statement that there will be “limited ranger presence in Class 1a parks” (Draft RPMP, page 30). Submitters can seek that stronger statements are made about the importance of the ranger service. The ranger service is an anomaly in Auckland Council where functions in other (local) parks are out-sourced. Indeed, a number of services formerly carried out by regional parks rangers have been out-sourced under the new governance. To ensure the continuance of the ranger service, there need to be policies in the plan as there were in 2010:

“Continue to provide the regional park ranger service...” (RPMP 2010, page 108).

The next section in a separate document comments on policies for the individual park areas in the Waitakere Ranges Regional Park.