

25 January 2017

The Gap Concept Plan

Submission from Waitakere Ranges Local Board

1. Introduction

The Waitakere Ranges Local Board (WRLB) welcomes the opportunity to make a submission on The Gap Concept Plan (CP). The land was purchased by Auckland Council in mid-2014. We acknowledge that the Board has had a workshop with regional parks on the CP. We wish to reiterate some of the points we made, and make others. Over the summer break, some members of the Board visited The Gap which helped at forming the views in this submission.

Our approach is informed by several understandings about the site:

1. It is a unique wilderness area, with extremely high natural values which need to be protected.
2. It is near to a visitor destination (Piha) which attracts a very high number of visitors and The Gap is likely to come under significant visitor pressure.
3. The opening of the Hillary Trail down this coast will attract more visitors for the spectacular views it will offer.
4. Significant fires have destroyed vegetation on northern parts of the site (1994 and 1998). There has been no restoration of this area and these areas have developed into monocultures of gorse.
5. These areas have now become heavily infested with climbing asparagus of which there have been only small areas of control.
6. The land is contiguous with Regional Parks' (RP) Tasman Lookout Track at the north, which is similarly infested with gorse and climbing asparagus: the areas should be approached in a coordinated manner.
7. There is a range of other pest plants on the site that need control.
8. The site contains kauri, and there may be trees infected with kauri die back.
9. The site adjoins the only land remaining in the ownership of the iwi, Te Kawerau ā Maki, on the whole coast¹.

¹ Other than any cultural redress properties on the west coast listed in schedule 3 of Te Kawerau ā Maki Claims Settlement Act 2015

2. Need to integrate new parkland into existing policy framework

We are unclear as to why RPs has chosen to develop a concept plan, before policy for The Gap is developed. We believe the development of policy for the site would help in framing a concept plan. The policy framework for RPs is set by the Regional Parks Management Plan 2010 (RPMP). The RPMP states that new parks will be covered by the plan as far as “general objectives and management policies” (Section 5.2, page 17). However as a specific purchase, The Gap is not included in Section 17 of the RPMP, which would require a variation to the RPMP, such as has recently occurred with Te Muri Regional Park. Consequently, The Gap does not have specific policy setting its park values, park vision, management focus and policies and principle relationships.

For the Waitakere Ranges Regional Park section of the RPMP (of which The Gap is part) there is a 2-tier approach. There are policies for the Waitakere Ranges Regional Park, and policies for Special Management Zones, such as Anawhata, Mercer Bay Loop Track etc.

This approach also integrates the Waitakere Ranges Heritage Area Act 2008 (Section 17.19.4). The RPMP must give effect to the Act. All parks’ decisions must taken into account the Act and be able to demonstrate how the Act was taken into account. When making decisions, the council will “Systematically, check off whether the decision would have an impact on the heritage features listed in the Act, in particular the provisions of Sections 7 and 8” (page 382). We have seen no sign that this has been carried out for The Gap.

The Gap purchase needs to be integrated into this policy framework. We can find no mention of the Act in the concept plan, and although the RPMP is mentioned, it is not clear how the RPMP has been considered.

Instead, the CP proceeds as if this existing policy framework does not exist – in effect, re-inventing it, but at the same time shifting direction from the provisions of the RPMP for the WRRP.

The WRRP is a Class 1 park with the following vision:

“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.” (Section 17.19.2).

It is the Board’s view that the CP does not adhere to this approach. The CP places the greatest emphasis on recreation and public safety, and hardly addresses protection and enhancement of the environment, natural and wilderness qualities, or stewardship.

The overall Gap CP objective is:

“To develop a concept plan in partnership with Te Kawerau-a-Maki and all stakeholders for the land area known as the Byers Property. The concept plan shall recognise the special

features of the future parkland while ensuring that the enjoyment and wellbeing of visitors and stakeholders is promoted.”

The CP “vision statement” is not really a Vision Statement, but once again emphasises recreation: the Hillary Trail, walks, and interpretation.

There is nothing in the objective or vision statement about the environment or the need to “protect and enhance” the natural values and wilderness qualities of the site.

Similarly, the first two first “design principles” of the CP are:

1. Manage and maintain recreational opportunities for the enjoyment and well-being of the local community, iwi, and visitors.
2. The site is well-connected and accessible.

The WRLB believes this overall approach of the CP makes a number of errors:

1. The first step should have been to develop policy for the new land and integrate this into the RPMP. This would have ensured that the approach at The Gap was consistent with the RPMP policies for WRRP and with the WRHA Act.
2. It would have enabled a fully participatory process for stakeholders and the public, enabling them to present at a hearing and discuss their concerns and recommendations. The current approach does not enable this active participation, being at arm’s length from the decision-makers
3. By starting “de novo”, without recognising the existing statutory policy framework, the policy approach is distorted, prioritising recreation and downgrading environmental restoration and enhancement.

The WRLB believes the Governing Body should take a step back and develop the policy framework for The Gap before proceeding further. This would enable it to be determined whether it should be given the status of a Special Management Zone which would define:

“...the important features of the locality, including any special or sensitive features to be protected, the desired quality of experience for visitors, and a series of policies that will ensure the location can cope with the defined level of activity.” (page 388)

This would also integrate the new parkland into the RPMP and make it subject to all the policies of the RPMP. It would also enable an assessment of the likely visitation to The Gap and how this will be managed, especially on constrained and fragile parts of the site, such as the Blowhole and “Tennis Courts”.

It is also important to recognise that the adjoining land – Taitomo Island – is the only land in the ownership of Te Kawerau-a-Maki on the West Coast.² As far as the public is concerned, this land is treated as part of the parkland. It is important to spell out how this relationship is to be recognised in

² Other than any cultural redress properties on the west coast listed in schedule 3 of Te Kawerau ā Maki Claims Settlement Act 2015

the development of the parkland and how Taitomo Island itself is to be protected from excessive visitors.

3. Need for coordination with the Waitakere Ranges Local Board

The WRLB sets policy for the local parks, including Piha and North Piha beaches. It is important that policies are coordinated between local parks and regional parks.

In particular, the WRLB recently set bylaws for dog rules on local parks. We took the overall approach of providing for dogs at North Piha, as a large off-leash area, and prohibiting dogs on Piha Beach which is a busy beach and has many rocky shelves with wildlife. We took advice from our Council bird experts in doing this and were told that The Gap area was a prime “coming ashore” and breeding area for little blue penguins. There are also fern birds and grey-faced petrels in the area. Tasman Lookout Track is already a dog prohibited area. However, Mercer Bay Loop Track is a dog on-leash area. As the Hillary Trail will connect these areas, it has to be considered how dogs will be kept out of The Gap area. We are strongly of the view that the new parkland at The Gap should be a dog prohibited area in its entirety.

The WRLB has a new programme which seeks to control climbing asparagus on private property in Piha. We are investing \$100,000 annually on Piha and Hua, and working with Ecomatters Trust and Council Biosecurity to systematically survey, advise on and if necessary control climbing asparagus at Piha.

We are aware that there are huge amounts of climbing asparagus on the Tasman Lookout Track and the new Byers block. A very small amount of control was carried out by Biosecurity for RPs in 2015/16, however, we are told there is insufficient budget to do more or control other pest plants.

It is critical that climbing asparagus control is the priority for this new land, and that it is budgeted for. This needs to go hand-in-hand with other pest plant control including gorse control, pampas control, and ginger and so on. This property is south-west of the Piha residential area so is a prime source of infection for the rest of Piha.

The WRLB would like a coordinated approach between itself and RPs, to enable a successful programme of control of pest plants. Currently, the success of the WRLB programme is jeopardised by inaction on the Byers block.

4. Need for an ecological plan, including ecological values, animal and pest plant control, restoration of the site, kauri dieback, and control of fire risk

The WRLB believes this should be the priority and should proceed before any other steps are taken. This would be consistent with Section 17.19 of the RPMP and the WRHA Act.

The area has significant areas covered in a monoculture of gorse, infested with climbing asparagus which appear to be in “the too-hard basket” for Auckland Council. After 22 years, there are no signs that regeneration of natives is occurring in these areas, indeed, the gorse is providing a nursery for climbing asparagus. This is a source of infestation for the rest of Piha and is also a high fire risk.

There is only one rough road into part of the site, so any fire would be very difficult to control as was found in the fires of 1994 and 1998.

The Board is alarmed that it is proposed to put new tracks through these gorse -infested, un-restored areas and believes no such new tracks should be cut until the areas are restored and the fire risk reduced. This includes the previously burned area of the Tasman Lookout Track which is similarly surrounded by large areas of 20-year-old gorse, infested with climbing asparagus, where it is proposed to put a link track.

It also believes the priority for funding should be pest plant control and restoration of the site, before budget goes into creating tracks, lookouts and other discretionary visitor infrastructure.

The Board is also concerned that despite the land having been in Council ownership for nearly three years – and open to the public all that time – no assessment has been made of the presence of kauri dieback and no hygiene stations have been installed. We have raised this with biosecurity in the last month and they have undertaken to visit the site.

5. Need to ensure infrastructure is subservient to natural environment

The WRLB supports the development of a continuation of the Hillary Trail down the Coast from Mercer Bay Loop Track to Tasman Lookout Track in due course.

The Hillary Trail is a Special Management Zone in the RPMP and has a vision and policies. This is another reason why The Gap land needs to be brought into the RPMP to ensure the policies for the Trail apply to this leg in a statutory manner. Without this, this leg would be outside the policies for the Hillary Trail. The RPMP also allows the capping of the number of recreational events in Special Management Zones and this has been done at several high-visitor use locations at Piha already. It may be desirable to cap events in this area, and this would not be possible without including The Gap within the RPMP.

We have concerns about the impact of the new trail leg on the very sensitive landscape of Gentle Annie. It was always intended that the Hillary Trail use existing tracks and these not be upgraded to “great walk” standard, that is, they remain at the standard of the WRRP. It is important this policy is continued with this newly created leg. We note that on Map 2 it states “as part of the Hillary Trail, tramping tracks need to be formed with a permeable fill”. This is a misunderstanding: the policy for the Hillary Trail is that there is no “standard” but that the standard of existing tracks is the Hillary Trail standard.

The WRLB supports maintaining existing formed roads and improving existing tracks, but not the formation of new tracks, as budget needs to be prioritised to ecological restoration. Existing tracks can be made more comfortable for walkers – the service road needs improvement for walkers, and tracks from the tennis court to The Gap needs to be taken away from the Blowhole edge and made more walkable (removal of gorse would help!). It is also not clear that there need to be new tracks, it may be that the existing tracks are sufficient. This could be evaluated again at some point in the future. Certainly, new tracks are not a priority.

The Blowhole needs special care to prevent wear and tear of this sensitive environment as visitor numbers inevitably increase. We only need to see what has been happening at Kitekite Falls and

Karekare Falls to see the potential for extreme visitor pressure at the Blowhole once the word gets out. The Council needs to have management strategies for how it is going to manage this, but there is nothing about this in the CP.

We are not warm to the notion of “safety barriers” or a “gate” or “rock chicanes” across the entrance to The Blowhole, as this will be a very obvious new built intrusion. We are not aware of any serious accidents at The Blowhole in the over 120 years it has been a tourist destination. We also question the need to place fences at the top of either end of The Blowhole. Tracks should aim to keep visitors away from these edges.

Similarly we believe that safety signage and interpretation should be kept to a minimum and carefully sited so it does not spoil or dominate views. The proposal to place safety signage on cliff edges and at The Blowhole itself is not supported. The RPMP policy is to site safety signage at arrival points rather than at the risk site itself, otherwise the Waitakeres would be littered with signs.

The six proposed interpretation signs within The Gap itself are too many, and many are proposed in locations which would detract from the natural landscape. There only need to be one or two signs in the flat grassed area of The Gap. No signs should go in The Blowhole or in the tennis courts itself, except perhaps if it is integrated into a lookout.

We are concerned about the proposal for a lookout on the tennis court cliffs and ask whether this is necessary. The only deaths from these cliffs that we know of have been deliberate.

If a lookout point is necessary, we do not favour stonework for barriers (stone seating is acceptable). A similar approach on Tasman Lookout Track had the effect of creating a straight line wall which is visible from a long distance away, also people constantly go around it.

The lookouts on Mercer Bay Loop Track and at Te Ahua Point, with posts and wires, sit more lightly on the landscape, and are more successful at constraining people’s movement.

We believe that the Piha Design Guidelines, developed for RPs at Piha, provide a good framework for infrastructure at The Gap.

We support restoration of the selliera radicans herbfield, which is highly valued by the local community. We do not agree with the argument that it should be allowed to completely infill with oioi, toitoi and other species. There is an argument that this process is “natural” but as the tennis courts have been modified over many years, it is hard to argue that letting weeds and natives invade it is “natural”. The tennis court area needs to be seen as a cultural landscape, rather a purely natural one.

The entire area does not need to be returned to selliera radicans, but particular areas could be restored.

We question the statement that only pedestrian access should be provided from Piha Road. We are opposed to the service road being used for anything but service vehicles, but would ask whether some parking needs to be provided at the top otherwise visitors will use the Piha Road lookout carpark for parking, leading to even more congestion there.

It is proposed that a bike track be investigated on the northern slopes. This is not supported. Recreational cycling – mountain biking – “is prohibited in the Waitakere Ranges Regional Park at all times.” This is a very long-standing policy which has been strongly supported by environmental and local community groups. (Section 17.19.6)

Summary

1. The WRLB seeks that policies for the development of the regional park at The Gap are integrated with WRLB policies and programmes
2. The WRLB believes integrating The Gap into the Regional Parks Management Plan should precede the adoption of a concept plan, otherwise The Gap sits outside Section 17 of the RPMP framework and is not subject to its policies nor is it able to set specific policies such as Special Management Zones and caps for The Gap.
3. The WRLB believes that the vision statement for Waitakere Ranges Regional Park contained in the RPMP should be the vision statement for The Gap land.
4. The Gap Concept Plan prioritises recreation over environment, whereas restoration and enhancement should be the priority for implementation and budget allocation.
5. A plan is needed for restoration and pest plant control: until areas are restored there should be no new tracks or viewing points created.
6. Restoration is also needed to address the significant fire risk in the previously burned areas.
7. Track development should follow existing or old tracks, rather than create tracks into new areas, unless it is to re-route tracks for safety reasons eg above the Blow Hole.
8. All infrastructure should be kept to a minimum and be carefully designed and sited.
9. Safety signage should be sited at arrival areas not actually at risk sites.
10. Interpretative signage should be kept to a minimum and carefully sited.
11. The WRLB supports restoration of the “tennis courts”, at least, in part.
12. Kauri dieback needs to be managed within the new parkland.
13. Dogs need to be prohibited within the new parkland because of the wildlife values.