



January 18, 2019

RE: Removal of 20 Eucalyptus trees from G089

Lily Burrows
City Planning
Dunedin City Council
PO Box 5045
Dunedin 9058

Dear Lily,

As per your January 9, email request for comment. Application LUC-2018-739 is a request to remove 20 Eucalyptus trees from G089. I have been requested to provide comment on the aspects within the condition assessment relating;

- a) to STEM (the Standard Tree Evaluation Method),
- b) on the effect of removal (to the other trees in the stand)
- c) on the replanting options put forward
- d) on the health and safety risk posed by the trees, *and*
- e) on the proximity to powerlines (of the proposed trees to be removed).

G089 is listed on schedule 25.3 of operative district plan as a 'G' Group of Gums (*Eucalyptus sp.*) at number 8 Scotia Street, Waikouaiti,

1. Details and documentation provided

I have been provided with:

- 1.1 The December 2, 2018 LUC-2018-739 - Tree Removal Application - 8 Scotia Street
- 1.2 The November 23, 2018, Waymouth report; Greentrees Tree Report including RMA application concerning the removal of 20 Eucalyptus trees from within a listed tree group G089 at 8 Scotia Street, Waikouaiti
- 1.3 The December 18, Resource Consent Notification
- 1.4 A copy of the G089 (25.05.01) DCC STEM form
- 1.5 An aerial image of 8 Scotia Street, Waikouaiti (and surrounding properties) with a GIS indication point locating G089
- 1.6 I visited the site on November 5, 2018, with DCC Planner Lily Burrows and Mr Waymouth
- 1.7 I provided arboricultural comment for Application LUC-2018-726 'Maintenance on significant tree G089' and a January 8, 2018, consent for 'emergency removal of a significant Eucalyptus tree at 8 Scotia Street'
- 1.8 It is my understanding that Mr Waymouth of Greentrees Limited has been given delegated authority to represent the applicant; Kathleen Ryan

2. Summary of information

- 2.1 The operative District Plan and the 2001 STEM report do not state how many gum trees there are in G089
- 2.2 There is a second significant group of trees (G088) listed on 25.3 of operative District Plan as a (G) Group of Gums (*Eucalyptus sp.*) at 7 Scotia Street (Road Reserve), Waikouaiti

- 2.3 The operative District Plan does not state how many gum trees there are in G088
 - 2.4 The 2001 STEM report uses the abbreviation 'sp.'. Sp. is used indicate a single species of the same genus (spp. is the abbreviation plural species; i.e. if it was recorded at *Eucalyptus spp.* would indicate that there were different types of Eucalyptus trees within the Group).
 - 2.5 The Greentrees November 23, 2018 report notes that for the purposes of the report he [Mr Waymouth] 'will refer to [the trees] as *Eucalyptus globulus* as they would appear to be the dominant species. In his report, Mr Waymouth identifies other species of eucalyptus within the Group and acknowledges that it can be difficult to identify eucalyptus down to species level.
 - 2.6 Mr. Waymouth's comments and the 'single' species classification given in the 2001 STEM report are completely understandable, there are more than 700 species of eucalyptus
 - 2.7 The aim of the Greentrees November 23, 2018 report is to clearly establish which trees are of sufficient value for listing on the District Plan
3. Trees to be removed (My understanding of the LUC-2018-739 Application)
- 3.1 Mr Waymouth has described 49 eucalyptus trees; 30 on number 8 Scotia Street, 10 on the number 7 Scotia Street Road Reserve (G088) and 9 trees along the edge of the Hawkesbury Lagoon
 - 3.1.1 The 10 trees on the number 7 Scotia Street Road Reserve (G088) are not owned by the applicant [Kathleen Ryan] and no works on or in G088 have been applied for in Consent Application LUC-2018-739
 - 3.2 Mr Waymouth has plotted and numbered 43 trees, divided the trees into four cluster groups and colour coded each cluster [image one]
 - 3.3 Mr Waymouth is requesting permission to fell trees twenty trees. Those trees, using his numbering system are; 01b, 02b, 03b, 04c, 05c, 06c, 07c, 29c, 08d, 09d, 10d, 11d, 12d, 13d, 14d, 15d, 16d, 17d, 18d and 19d [image two]
4. Trees to be retained
- 4.1 Mr Waymouth is proposing to retain nine (9) trees on number 8 Scotia Street. All of these trees are on the Eastern (the Hawkesbury Lagoon) side of the property
5. Comment in relation to the G089 (25.05.01) DCC STEM
- 5.1 The 2001 STEM report do not state how many gum trees there are in the Group or indicate where on the property the group is
 - 5.2 The 2001 STEM report awards G089 156 points.
 - 5.3 If STEM were applied to the all 29 mature eucalyptus trees currently standing on number 8 Scotia Street I would suspect that the score may drop 6 points on the Amenity Evaluation section; 15 points group of 10+ down to 9 points Parkland. The Condition Evaluation would remain unchanged (in my opinion) giving a total of 150 points, therefore G089 would be worthy of retention and protection under the Proposed 2GP
 - 5.4 I have applied STEM to the Group of 9 trees on the on the Eastern (the Hawkesbury Lagoon) side of the property (the trees the Mr Waymouth is proposing to retain). The Condition Evaluation remained at 75 points, assuming there is consistency with the 'Amenity Evaluation' section then the score awarded would be 156 points and therefore G089 would be worthy of retention and protection under the Proposed 2GP

6. Comment in relation to the effect of removing 20 Eucalyptus trees from G089

- 6.1 Based on the Group containing 29 mature Eucalyptus trees. The removal of the 20 trees identified would leave a Group of single species trees growing in a stand that is approximately 50 metres long and 20 metres wide.
- 6.2 The removal of 20 trees would be detrimental to those trees, but the effect of the remaining trees would be positive. I believe that this would enhance the remaining trees in the Group by:
 - 6.2.1 focusing and enhancing the amenity value of the 9 remaining
 - 6.2.2 defining the size and number of the group so it can be effectively managed for future generations
- 6.3 The removal of the 20 trees also has the potential to enhance the amenity of the area by
 - 6.3.1 Allowing the trees currently being suppressed by the gums to mature and reach their potential (there are a number of different tree species on the western side of the property).
 - 6.3.2 Making space available for replanting and the potential for scheduled trees of the future (there is sufficient space to allow several trees of substantial size and stature to develop)
 - 6.3.3 Providing opportunity to increase species diversity (based on replanting with a mix of native and exotic trees)

7. Comment in relation to replanting

- 7.1 Mr Waymouth has provided a list of native and exotic trees to be replanted in the space that would become available if the application was approved. Currently underneath the proposed trees for removal are a mix of native and exotic trees. It would make sense to enhance that mix and plant a selection of both native and exotic trees from his list
- 7.2 Mr Waymouth notes that *'tree replanting is best done immediately after felling work is completed'*, I recommend that the replanting of native and exotic trees takes place immediately after felling work is completed
- 7.3 Mr Waymouth does not include any eucalyptus species in his replanting list but in his report, he notes that *'Eucalyptus are capable of regenerating from the stump, and with careful management it is possible to regrow a tree'*. I would strongly recommend against allowing the 'regeneration' of any of the felled gum trees. Without careful and ongoing management 'regenerated gums' have the potential to fail at the base and the regrowth is often vigorous.

8. Comment in relation to on the health and safety risk

- 8.1 Mr Waymouth has undertaken a qualitative Tree Risk Assessment on 39 trees, 19 of those trees he gives a 'low' risk rating. Only 9 of those 19 trees are on number 8 Scotia Street and are part of G089, the remaining 10 trees are on the number 7 Scotia Street Road Reserve (G088) are not covered by this application.
- 8.2 In general, I accept Mr Waymouth's risk assessments of these trees, but feel that his comments in relation the house at 10 Scotia Street (being 'partially within the dripline of three trees) are somewhat vexing. Resource Consent (for works under the drip-line) was not applied for or given when the construction works for this house took place – placing a house under drip-line of a tree and then raising concerns when things fall from that tree onto the house is somewhat disingenuous. *I understand that the current owner(s) were not involved with the construction of the house and that they are dealing with an issue that the developer created for them.*
- 8.3 I believe that Mr Waymouth has overstated the actual risk, but there are still sufficient health and safety risks to people and property within number 8 Scotia Street to warrant the selected removal of trees that;
 - 8.3.1 Currently have the potential to fail (completely or partially) onto the dwelling
 - 8.3.2 May fail (completely or partially) as a result of the removal of adjacent trees

9. Comment in relation to on the proximity to powerlines

- 9.1 A low voltage powerline runs long Scotia Street and passes near the roadside boundary of the property. Utility pruning has been undertaken to ensure the trees comply with the Electricity (Hazards from Trees) Regulations 2003. There are a number of different trees species that are have been pruned, but the eucalyptus trees in G089 are of sufficient distance away from the lines that ongoing pruning to comply with the Electricity Regulations will not compromise them.
- 9.2 Proximity to powerlines is not a problem and should not be a consideration in relation removing 20 trees from G089

10. Recommendations in relation to Application LUC-2018-739

- 10.1 I recommend that the Council approve the removal of the twenty eucalyptus trees described in Mr Waymouth's report as trees; 01b, 02b, 03b, 04c, 05c, 06c, 07c, 29c, 08d, 09d, 10d, 11d, 12d, 13d, 14d, 15d, 16d, 17d, 18d and 19d [image two]
- 10.2 I recommend that the number of trees (9) is added to the G089 description in the 2GP Schedule (F. Appendices - A1 Schedules - A1.3 Schedule of Trees)
- 10.3 I recommend that the GIS data point currently associated with G089 on the 2GP A1.3 Schedule of Trees is moved to the opposite side to the property to better reflect the actual location of the Group
- 10.4 I recommend that a selection of both native and exotic trees from Mr Waymouth's replanting list are planted in the area that becomes available once the 20 trees are removed
- 10.5 I recommend that the replanting of native and exotic trees takes place after the felling work is completed
- 10.6 I recommend that the none of the felled eucalyptus trees are allowed to regenerate from their stumps
- 10.7 To ensure the longevity and integrity of the Group that is G089, when required, I recommend that only *Eucalyptus globulus* or *Eucalyptus saligna* are planted within the Group

As per your request, I have provided a relatively concise report. If you require an explanation of any of the recommendations provided, or documentary evidence to support any of the content in this report please do not hesitate to ask.

Yours sincerely



Mark Roberts
Roberts Consulting Ltd

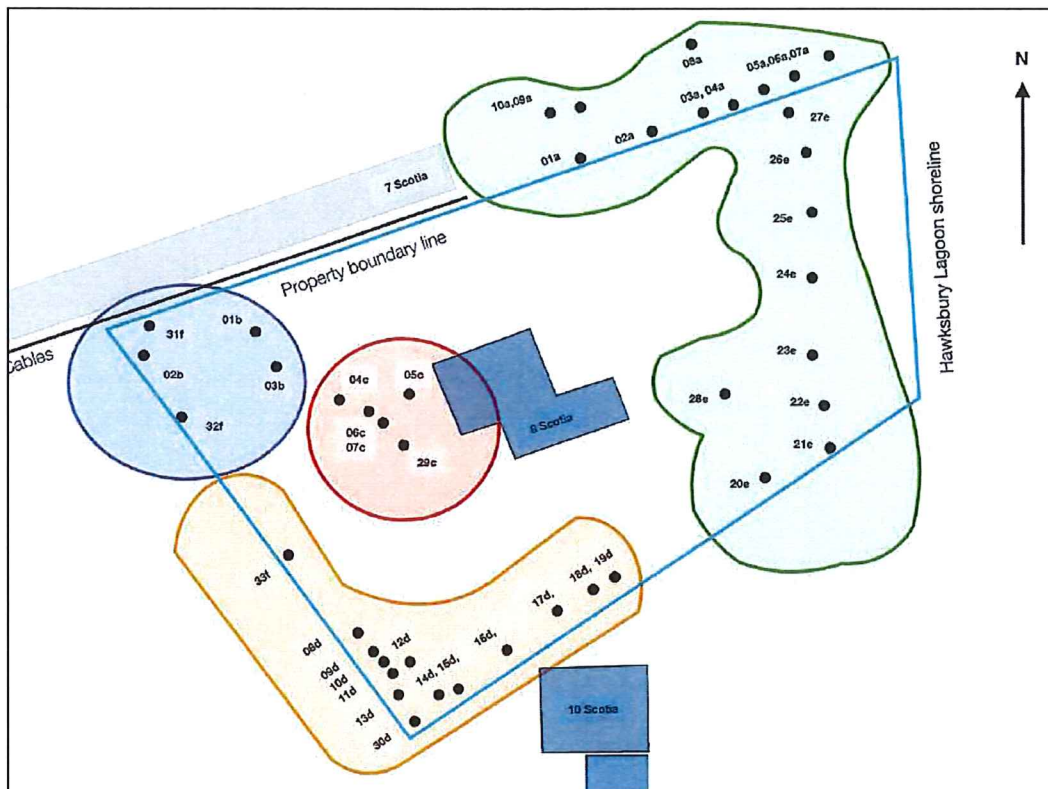


Image one: An image from Mr Waymouth's report showing the plotted and numbered 43 trees, divided the trees into four cluster groups and colour coded each cluster

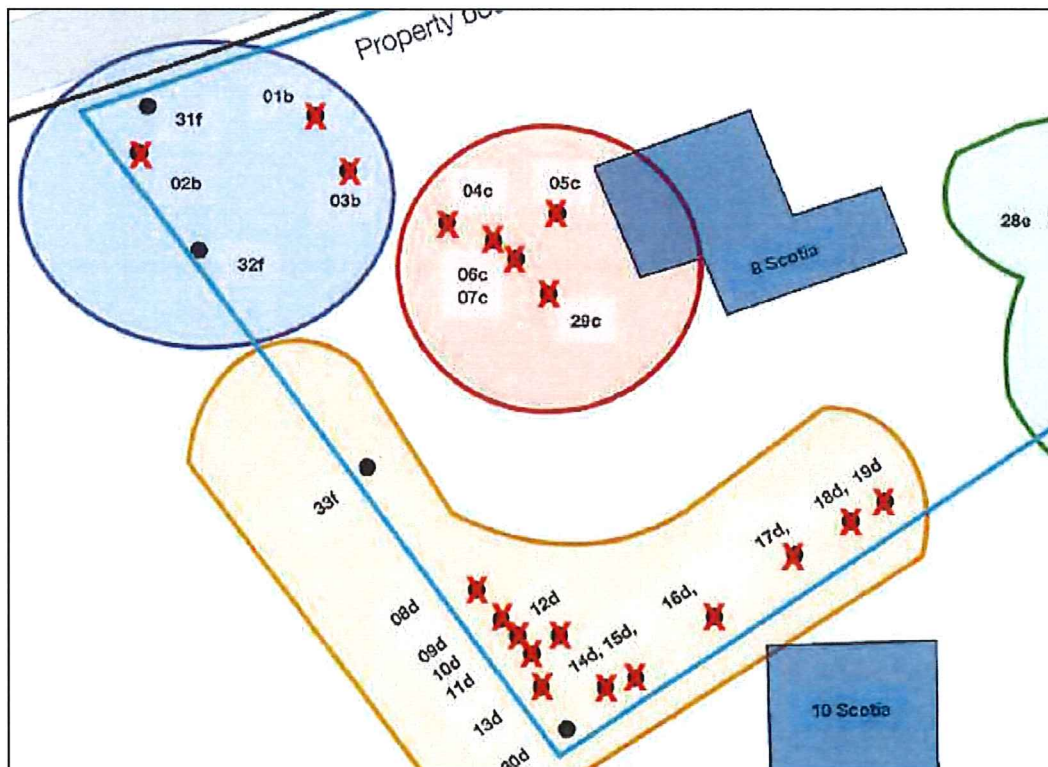


Image two: A section of the above image from Mr Waymouth's report showing the 20 trees selected for removal marked with an X (trees marked by myself – this image does not appear in Mr Waymouth's report)