

# Memorandum

TO:

Lily Burrows, Planner

FROM:

Luke McKinlay, Urban Designer

DATE:

25-January-2019

**SUBJECT** 

Land Use Consent – Scheduled Tree LUC-2018-739 – 8 Scotia Street

Hi Lily,

This memorandum is in response to your request for comment on the application to remove 20 Eucalyptus trees (G089) from 8 Scotia Street, Waikouaiti, which are included in Schedule 25.3 of the Dunedin City District Plan. Reasons given in the application for the tree removal include risk to personal safety and potential damage to property and electrical transmission lines.

It is noted that you have identified the following technical difficulties with the proposal:

- 1. The STEM assessment from 2001 (refer attachment 1) does not identify the species of eucalyptus, or the number of trees included in the group and there is only one photograph of a discrete cluster of the trees taken from the Scotia Street road reserve.
- 2. It is difficult to tell which eucalypts grew after 2001 and if they should be included in the significant group of trees.
- 3. The site has not been surveyed and the boundary is unclear.

The original STEM assessment, which was made in 2001, resulted in a score of 156, which is above the required 147 "pass" total.

Under the Operative District Plan (ODP), the proposal is a restricted discretionary activity pursuant to Rule 15.5.1(i). As such, Council are to have regard to the health and quality of the trees, the reason for the proposed work and any alternatives and the impact of the removal upon the amenity of the locality and values of the trees.

Under the Proposed District Plan (2GP), the proposal is a non-complying activity pursuant of Rule 7.3.2(3), which seeks to avoid the removal of scheduled trees unless:

- I. There is a significant risk to personal/public safety or a risk to personal safety that is required to be managed under health and safety legislation
- II. The tree poses a substantial risk to a scheduled heritage building or structure
- III. There is moderate to significant risk to buildings
- IV. The removal of the tree is necessary to avoid significant adverse effects on existing infrastructure and network utilities, or
- V. The removal of the tree will result in significant positive effects in respect of the efficient use of land (Policy 7.2.1.2)

## **Background**

When an assessment of a resource consent application for the removal of a significant tree, or group of trees, is required, an updated STEM assessment is usually completed by the inhouse landscape architect and by a consultant arborist.

In the case of this application, Mark Roberts has been engaged by council to provide an arborists assessment. He has provided a thorough set of comments and has calculated a total score of 150 points for the tree group using the STEM evaluation system (based on an assessment of all 29 mature eucalyptus trees at 8 Scotia Street). This slight decrease is due

to a reclassification of the trees from a group of 10+ (15 points) to a parkland group (9 points).

It is noted that there is a second group of Eucalyptus trees (G088) within the road reserve at 7 Scotia Street, which are also listed on schedule 25.3 of the ODP 7 Scotia Street and referred to in the GreenTrees Ltd report, but are not part of this application.

## The proposal

Twenty Eucalyptus trees are proposed to be removed from 8 Scotia Street in order to lower future risk to people and property. Nine Eucalyptus trees near the Hawksbury Lagoon shoreline are to be retained. To retain the privacy of the occupants of the property and mitigate a loss in broader community amenity values caused by the proposed tree removal, the applicant is proposing to replant the site with a mix of native and exotic tree species.

The Greentrees Ltd report identifies 40 eucalyptus trees; 30 at 8 Scotia Street (including the 9 along the edge of the Hawksbury Lagoon) and 10 within the 7 Scotia Street Road Reserve (G088) (not part of this application). All 20 Eucalyptus trees within the subject site, which are not bordering the lagoon are proposed to be removed.

## **Arborists Report**

Councils consultant arborist, Mark Roberts, has reviewed the proposal and associated report, prepared by GreenTrees Ltd. In general, he accepts the risk assessment findings and makes the following recommendations:

- That council approve the removal of the 20 eucalyptus trees identified in the GreenTrees Ltd report;
- That a selection of both native and exotic trees from the GreenTrees Ltd report replanting list are planted in the area that becomes available once the 20 trees are removed,
- That none of the felled eucalyptus trees are allowed to regenerate from their stumps

### **Amenity Effects**

These comments are restricted to considering broader amenity values associated with the tree group. It is acknowledged that the planner must weigh up the amenity values of this group and any potential adverse effects of tree removal alongside issues of health and safety and effects on property.

I undertook a site visit of the area surrounding 8 Scotia Street on 22 January 2019 to determine the likely effect of the development on existing visual and landscape amenity values. Photographs taken at this time are appended to this report as Attachment 1. Broadly, effects are considered from nearby residential locations and from the walkways within the adjacent Hawksbury Lagoon Reserve.

The Hawksbury Lagoon forms an important part of the existing landscape context and is recognised as an Area of Significant Biodiversity Value (ASBV). Whilst the predominant tree species surrounding the lagoon are exotic (poplar, willow, pine and eucalyptus), extensive replanting of the lagoon margins and the causeway within the reserve has been undertaken with locally-sourced native plants.

From nearby residential locations, the removal of the 20 trees will noticeably reduce the extent of this cluster, but the retention of the 9 trees along the lagoon edge, when seen alongside the trees within 7 Scotia street, will mean that a largely continuous band of trees, approximately 60m in length, will remain. These remaining trees will continue to form a broad backdrop to the site when viewed from residential locations to the west (refer figures 1 & 2). The height of the individual trees and the contiguous nature of the cluster means that these trees form a notable landmark at the lagoon edge and will remain particularly prominent in the context of this flat landscape.

From locations within the Hawksbury Reserve, the 9 trees to remain, and those within the adjacent road reserve, are the most prominent trees in the existing cluster. From locations to the east (refer figure 5), these trees on the lagoon edge largely screen views of the trees to be removed. The cluster of trees to be removed on the southern boundary, adjacent to 10 Scotia Street, are more distinct when viewed from locations near the southern entrance to the reserve (refer figure 6), however, the diminishing effect of distance will mean that their removal will not be highly prominent from this location and surrounding areas.

From some outlying residential locations in Waikouiaiti, where visible, the existing cluster of trees are seen as one of several clusters of tall exotic vegetation near the edge of the lagoon (refer figure 7); other stands include groups of poplar, willow, eucalyptus and pine. In general, the retention of the 19 trees within 7 & 8 Scotia Street will avoid any unacceptable adverse effects on existing amenity values from these more distant locations.

#### **STEM Assessment**

There are two broad assessment categories to a STEM report – condition (health) and amenity (community benefit). My role in the assessment of applications to remove a scheduled tree, or group of trees, is to comment on the amenity related matters only.

There remains some doubt as to which trees within 8 Scotia Street were included in the 2001 STEM assessment. In general, it is agreed with Mr Waymouth's assessment that the smaller cluster of trees internal to the site (G089.04c-07c.29c), those near the western corner of the site, set amongst two large pine trees (G089.01b\_03b), and those bordering 10 Scotia Steet (G089.8d\_19d, 33f) have a lesser contribution to wider community amenity values than the contiguous cluster of trees adjoining the lagoon.

As noted in Mr Roberts report, if the STEM were applied to all 29 eucalyptus trees within this property, there would likely be a reduction in the assessment by 6 points as the cluster would likely fit within the 'Parkland' category of the proximity assessment rather than the 10+category. Given that Mr Roberts has assessed the condition evaluation as being unchanged, this results in an overall total of 150 points, which is just above the 147 'pass mark'. I agree with this assessment.

## **Concluding Comments**

Overall, it is my opinion that the proposed removal of the 20 eucalyptus trees will not have unacceptable effects on the broader amenity values of the surrounding area, if mitigation replanting is undertaken. It is considered that the nine Eucalyptus trees to remain, in combination with the 10 Eucalyptus within the 7 Scotia Street road reserve, will continue to form a prominent cluster of tall vegetation at the lagoon edge when seen from both within the Hawksbury Lagoon Reserve and from locations within the settlement of Waikouiaiti, which will help to maintain amenity values. Proposed replanting will mitigate the diminished size of this existing cluster of trees and potentially add to the diversity and visual interest of the site, as the proposed new tree planting establishes.

#### Recommendations

- The nine trees in the scheduled tree group G089 bordering the Hawksbury Lagoon, which are identified in the GreenTrees Ltd report, prepared by Peter Waymouth, are to be retained and have ongoing protection under the scheduled tree register.
- A landscape plan for 8 Scotia Street shall be prepared by a qualified landscape architect, which will aim to enhance the privacy of the occupants of 8 Scotia Street and the amenity of the surrounding area. Given the context of the adjacent Hawksbury Lagoon, which is recognised as an ASBV, it is recommended that planting includes ecosourced, locally appropriate species. Planting shall focus on peripheral areas of the site where eucalyptus trees have been removed. The planting plan should include the botanical name, common name, numbers, size at planting, planting spacings and

mature height of all proposed planting. Planting shall take place within the first growing season following the felling of the eucalyptus.

The plan shall include species from the list attached to the GreenTrees Ltd report, with the exception of the following species which pose a potential risk of spreading/are plant pests: ash, rowan, hawthorn, douglas fir, larch and pine.

The following, locally appropriate, species are recommended to be added to the list of potential tree species for planting on the site.

- o Coprosma areolata
- o Coprosma crassifolia
- o Myrsine australis
- o Plagianthus regius
- o Pseudopanax ferox
- o Solanum laciniatum
- o Coprosma lucida
- o Dacrycarpus dacrydioides
- o Podocarpus totara
- o Prumnopitys taxifolia

Regards,

Luke McKinlay

**CITY PLANNING** 

# Attachment 1. Site Photographs

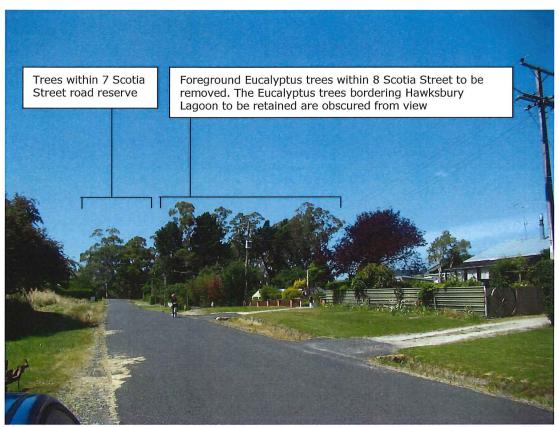


Figure 1. View towards site from near the intersection of Beach and Scotia Streets (150m from site).



Figure 2. View east, towards site from Geelong Street (100m from site).

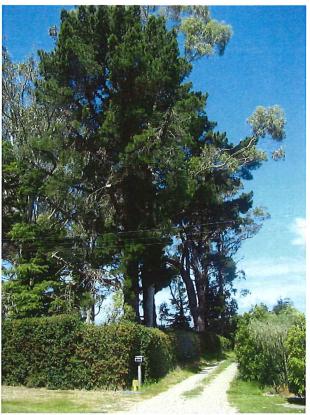


Figure 3. View of trees along western boundary of the site, adjoining driveway to 10 Scotia Street.



Figure 4. View of internal cluster of trees proposed to be removed (referred to as G089.04c- G089.29c in GreenTrees Ltd report) from entrance to site.



Figure 5. View towards tree groups G088 & G089 from Hawksbury Lagoon Reserve walkaway.

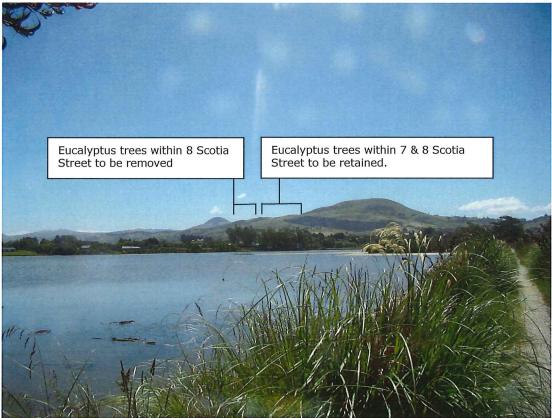


Figure 6. View towards tree from southern entrance to Hawksbury Lagoon Reserve (800m from site)

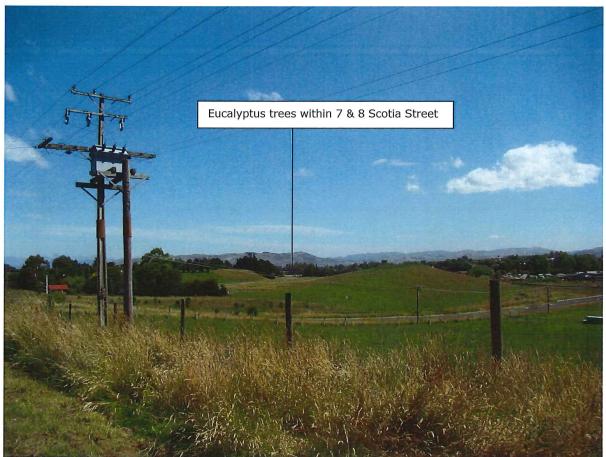


Figure 7: View to the southwest from Edinburgh Street, towards the tree group (1.6km from site)