

15 October 2019

Brooke Dales
Director/ Planning Consultant
DCS
brooke@dcs.co.nz

Dear Brooke

Resource consent application at 1110 Great South Road, Mount Wellington (LUC60344578) - Section 92 request

1. I refer your letter dated 13 September requesting further information on the resource consent application for revegetation restoration and exotic vegetation removal works at Ōtāhuhu.

Acoustic

2. In response to Mr Runcie's request, Jon Styles has prepared a memo dated 2 October 2019 (Attachment 1) to address questions 1 and 3. Question 2 is responded to below.
3. As outlined on page 10 of the Acoustic report included with the AEE, if the helicopter drop zone is at the northernmost part of the processing site in Bert Henman Park, noise levels would at the closest houses and would not exceed 75dB L_{Aeq}. Point receiver calculations¹ modelled the drop zone in the centre of the processing site demonstrated that the noise level at the closest residential properties would be 77dB L_{Aeq} for Sector 3, and 79dB L_{Aeq} for Sector 4. While there is every intention to locate the drop zone to achieve compliance, the exact location of the helicopter drop zone for the processing site cannot be confirmed as it is dependent on various safety factors. For this small infringement Mr Styles considers noise levels generated by a helicopter drop zone in the centre of the processing is not unreasonable. This is evidenced by condition 2 of Mr Styles report including the recommended change proposed in his attached memo.

Landscape

4. The memo from Sally Peake, Landscape Architect, dated 18 September 2019 (Attachment 2) addresses points 2- 5 of section 92 request. I also add the following comments.

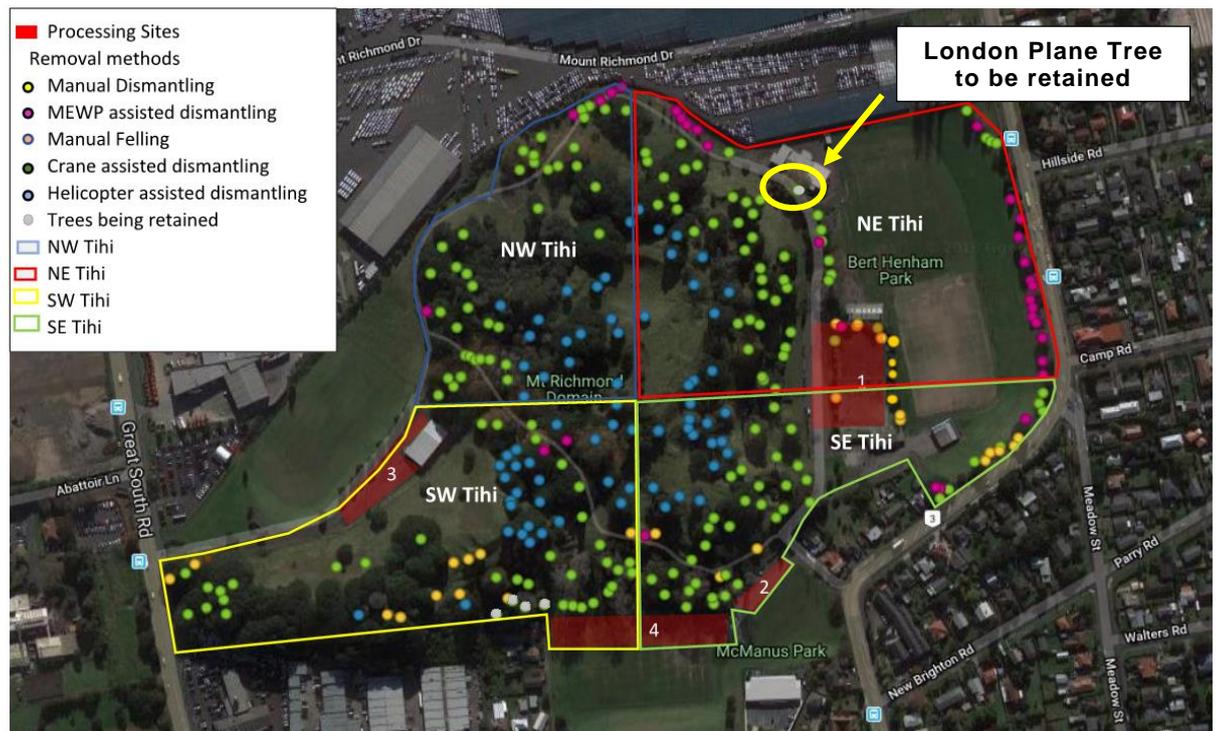
Retention of the London Plane tree

5. The location of the tree is shown on Figure 3 of the Tree Removal Methodology prepared by Treescape² and highlighted on the aerial below.

¹ Styles, 2019, NE Sector 3 Areas 1-3 and SE Sector 4 Areas 1-3

² Appendix 4, AEE

Aerial highlighting the London Plane in the south eastern corner of the Rovers Rugby Clubrooms buildings.



Morton Bay Fig tree stumps

6. It is correct that there are 26 Morton Bay Fig trees that will be cut to stump. Not all stumps will be visible from Great South Road to the west of the site. One Morton Bay Fig tree is growing within the western slope closest to Great South Road and nine in the water tower sector³. The one stump in the motor club and ten stumps in the tihi sectors will be too far away, some 300m from Great South Road to be discernible.
7. The stumps will be cut to approximately 1m above ground level, in some cases less. All native vegetation around the stumps will be retained. A comparison between Figure 3⁴ showing locations of native vegetation to be retained and Figure 4⁵ depicting locations of exotic vegetation to be removed illustrates that there is a significantly greater number of native trees than exotic trees in the water tower sector and also a dense native presence on the western slope of the tihi. Noteworthy, is that the western side of contains the greatest presence of native vegetation on Ōtāhuhu. Retention of native vegetation and surrounding grasses will assist with screening and visual integration of the stumps when viewed from Great South Road. Further, the audience along Great South Road is transient, and moving, and the stumps at best would only be visible, if at all, to those travelling in a southerly direction.
8. To reduce the likelihood of the Morton Bay fig stumps re-sprouting they will be coated with Agpro Meturon which is already used by the eco contractors on other maunga as an effective

³ Figure 4 Tree Inventory and Table 5, Summary of Exotic Trees Treescape, 2019

⁴ Treescape, page 7

⁵ Treescape, Page 13

growth suppressant. Routine on-going maintenance as part of a wider programme for the whole maunga will also be in place to manage re-sprouting should this occur.

Wider Views towards the site/maunga

9. It is acknowledged that intervisibility is a key role in volcanic view protection provisions in a wider environmental context. However, additional protection of volcanic viewshaft provisions under the AUP for this maunga as suggested by Mr Kensington requires a request for a private plan change subject tested through the Resource Management Act 1991 process. The applicant does not wish to initiate this process at this time.

Environmental Management Plan

10. Reference to the Environmental Management Plan at 5.18 and 5.43 of the AEE and in the proposed conditions is incorrect. This was carried over from earlier tree removal methodology. Apologies for the confusion.

Preliminary review comments

11. Thank you for providing preliminary comments on the substantive matters.
12. The confusion over the ONF appears to be referencing the Historic Heritage Overlay. The ONF mirrors the boundaries of Ōtāhuhu while the Historic Heritage Overlay (**HHO**) is smaller. Aerials showing the overlays are included in Appendix 2 - Rules Table. While technically there are fewer trees in the HHO and consent could be sought for less to be removed accordingly, it was considered that the breakdown is of no consequence for the application.
13. The applicant has considered your suggestion to transplant some of the juvenile exotic trees to be removed along Mt Wellington Highway. Due to complexities with increased timeframes, traffic disturbance, and ground disturbance this has been discounted.

Should you have any questions regarding the above, do not hesitate to telephone to discuss.

Yours faithfully



**Jodie Mitchell BRPlan (Hons)
Richmond Planning Limited**

Encl:

*Attachment 1 Acoustic memo
Attachment 2 LVA memo*

Consulting Advice Note

Date	2 October 2019
From	Jon Styles
To	Jodie Mitchell
Project	Ōtāhuhu / Mt Richmond - Exotic Tree Removal
Re	LUC60344578 Request for further information

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Styles Group have been requested to provide further information to address the acoustic information requirements set out in the section 92 request prepared by DCS on behalf of Auckland Council dated 13 September 2019.

The information requests and our response to each request are set out below:

- 1. The noise contours show levels over the AUP limit of 75 dB LAeq through some properties which is explained (page 8) as compliant but not shown as such due to elevated nature of the helicopter noise source. Please confirm why this is the case if the receiver contour levels are all at set at 1.5m above ground level and so should show the accurate levels at that height.*

The noise level contours for helicopter work are indicative only and are subject to uncertainty arising from the interpolation between grid points in three dimensions to a greater extent than noise models where the noise sources and receivers are at similar heights.

The comment in page 8 that explains how the noise levels are compliant at some properties even where the 75dB LAeq contour runs midway through some properties. This is because in some cases, there are no houses on half (or part) of the property that the contour runs through, and where the house is on the 'outside' of the contour. Given that the noise level is to be measured 1m from the facade of the house, the noise level will still be compliant.

However, in many cases the noise level at the houses is predicted to be above 75dB LAeq, and this is why consent is sought to exceed the AUP limit.

- 2. Comments are made regarding NE Sector 3 and SE Sector 4 noise levels regarding preferred locations (from a noise effects point of view) to meet the AUP limits. Please provide confirmation that these locations are feasible and that they can be used as BPO to reduce levels.*

This question will be answered by the project team.

- 3. Given that helicopter noise is the identified cause of exceedances (and it does not appear consent is sought for exceedance of the AUP limits for other activities), there appears to be no need for the increased noise limit for non-helicopter work as proposed in*

condition 1. Please confirm whether this proposed limit is necessary and provide the necessary assessment information to support this.

We have reviewed proposed conditions 1 and 2 and agree that some modification to Condition 1 is necessary to reduce the level from 80 to 75 dB L_{Aeq} and to improve the clarity of the conditions. Our recommended changes are set out below:

- (1) The noise from all works (~~except the use of the helicopter~~ when the helicopter is not operating) shall comply with a noise limits of ~~80dB L_{Aeq}~~ 75dB L_{Aeq} when measured 1m from the facade of any occupied building in accordance with NZS6803:1999 *Acoustics – Construction Noise*.
- (2) The noise from all works when the helicopter is operating ~~the use of the helicopter~~ shall comply with a noise limit of 85dB L_{Aeq} when measured 1m from the facade of any occupied building in accordance with NZS6803:1999 *Acoustics – Construction Noise*.

These modifications are necessary to reflect the fact that during noise measurements, it will be unable to separate the sources of noise and apply different limits to each. These changes do not vary the level of effect that is authorised. We expect that this answers the s92 question adequately.

Please contact me if you require any further information.

Yours sincerely,



Jon Styles, MASNZ
Director and Principal



LANDSCAPE ARCHITECTURE □ URBAN DESIGN □ PROJECT MANAGEMENT

LANDSCAPE response

To: Jodie Mitchell
Richmond Planning Ltd

From: Sally Peake
Landscape architect, urban designer

Date: 18th September 2019

Subject: Otahuhu/MT Richmond vegetation Removal

Application #: LUC60344578

Dear Jodie

This memorandum is provided to aid in your in response to Council's request for information from Peter Kensington as set out in the letter from DCS dated 13th September 2019.

1. Retention of one London Plane tree

You will recall from past discussions that the assessment of visual effects identified potential adverse effects arising from the total removal of exotic trees around the sports buildings in Bert Henham Park, particularly when viewed from Mt Wellington Highway. The London Plane tree is question is considered to have a scale and location that contributes to the integration of the adjacent building into the landscape and for that reason is proposed to be retained.

2. Camellia trees

As part of the assessment of effects, consideration was given to the inclusion of a review whereby once the tree removals were complete (and after an acceptable period to period of staged removal of trees/future amenity planting around building/parking will protect visual amenity

The Camellia trees are proposed to be retained in the short term for similar reasons. The assessment of effects determined that the the wholesale removal of all exotic vegetation would increase the visibility and visual

impacts of buildings and development, particularly in relation to close and expansive views. For this reason, consideration was given to either phased removal and replacement with native trees, or a review and potential replanting following a reasonable period. The proposed condition is intended to manage these potential adverse effects.

3. Morton Bay Fig tree stumps

This matter was also canvassed during my assessment of effects and I deferred to the expertise of the arborists who advised that the stumps would be cut down to a height where they would be rapidly obscured by grass.

With regard to regrowth I also defer to the expertise of the arborists in this matter.

4. Wider views towards the site/maunga

I agree that there are also opportunities to view the site from more distant viewpoints, including from other maunga and across the Mangere Inlet, from Mahunga Drive in the vicinity of Te Puea Marae and that these were not included in my assessment of effects.

While I have not analysed these views, I consider that the proposed vegetation removal would potentially enhance the visibility and integrity of the maunga from these places and that intervisibility is a key role of the volcanic view protection provisions in a wider environmental context.

However, it is outside of the scope of this LVA assessment to comment on additional protection of volcanic viewshaft provisions under the AUP for this maunga.

5. Discrepancy between the application tree schedule and the Wilcox publication

I have relied on the arboricultural survey to identify the tree species and can only assume that the trees identified in the Wilcox publication have been removed subsequent to 2012.