

28 August 2024

Auckland Council (Resource Consents)

Attention: Alice Curwood, Intermediate Planner
by email: alice.curwood@aucklandcouncil.govt.nz

Dear Alice,

Response to a request for further information under section 92 of the Resource Management Act 1991

| | |
|---------------------|--|
| Application Number: | BUN60433077 |
| Applicant: | Auckland Council (Parks and Community Facilities) |
| Proposed Activity: | To construct a public pathway within Point England Reserve through to Wai O Taiki Reserve with associated earthworks, tree and vegetation removal. |
| Address: | 254 Point England Road, Point England |

Further to the request for further information dated 3 July 2024 and subsequent emails, please find below a response to be read in conjunction with the related attachments. For ease of reference, the response is provided below in green.

Planning

1. Is there any lighting proposed under this stage of the development?

No lighting is proposed.

2. Is there to be any comprehensive signage proposed at this stage of the development? E.g. Signage directing pedestrians or new park name signage?

Signage is proposed as detailed in the updated Revision 4 drawing set. Please find this attached. None of these signs trigger resource consent, they are all less than 1 metre in height. Free standing signs less than 1.5 metres in height are not considered buildings and none are located in an overlay where structures would be considered to trigger resource consent (ie: none are located in a historic heritage extent of place). The activity of “directional signage” is included in the definition of public amenities which is a permitted activity in all open space zones (H7.9.1(A16))

3. The Iwi correspondence provided states that:

“The co-design process confirmed the Omaru Creek Bridge as one of the key opportunities along the pathway for local iwi to contribute to rich design outcome. The other opportunity for creative expression was confirmed on the path surface and etched concrete on the path leading up to all bridge structures and pathway connections”.

Please provide any plans which show proposed designs/ materials/ finishes along the pathway/boardwalks.

Discussion is underway with Ngati Paoa. A site visit was carried out on 9 August 2024 and a second one will be carried out 30 August 2024. Ngati Paoa have requested that the existing design language be carried from Stage 1 into Stage 2 including sand blasted motifs in concrete before structures and at road connection and stone bollards at road connections. Other potential design features will likely be limited to a pou and artwork on the bridge handrails.

4. Most of the boardwalk sections of the pathway run along the side yard of the site. The Open Space Zone requires a 6m side yard setback where the site adjoins a residential zone under Table H7.11.3.1 Yards.

Under Chapter J, Table J1.4.1: a boardwalk over 1.5m in height from ground level, inclusive of the height of any supporting structure is considered a 'building'.

Please confirm the proposed boardwalks are considered buildings within the site yard.

Boardwalk on TP1 from CH40m to CH65m is approximately 1.0m to deck level with 1.2m high barriers giving a total structure height of 2.2m

Boardwalk on TP1 from CH172m to CH209m (photo below) is approximately 2.1m to deck level with 1.2m high barriers giving a total structure height of 3.3m. Note that the boardwalk deck level will be approx. 300mm below the top of the retaining wall level.

All other structures are greater than 6m from neighbouring property boundaries.

Accordingly, it is requested that an additional reason for consent is included for the infringement of the side yard standard. This is a discretionary activity under H7.9.1(A39).

Assessment of this non-compliance is provided as follows:

- **The boardwalks in both of these locations sit below the levels of the adjacent residential properties, as evident in the photograph below.**
- **The boundary at this location is fenced with a boarded fence approximately 1.8m in height. In addition, there is a retaining structure approximately 1.0-1.5m in height. The proposal will not result in overlooking into adjacent properties.**
- **The boardwalk structures have limited bulk and built form, therefore limiting any dominance effects on adjacent residential properties.**

- **Placing the boardwalk in the location proposed avoids the need for extensive vegetation clearance.**



5. It has been identified that a portion of the Omaru Stream is classified as a Wetland. Please see attached plan. Due to the presence of the wetland and associated works, the proposal will trigger the following reasons for consent under the NES-F:

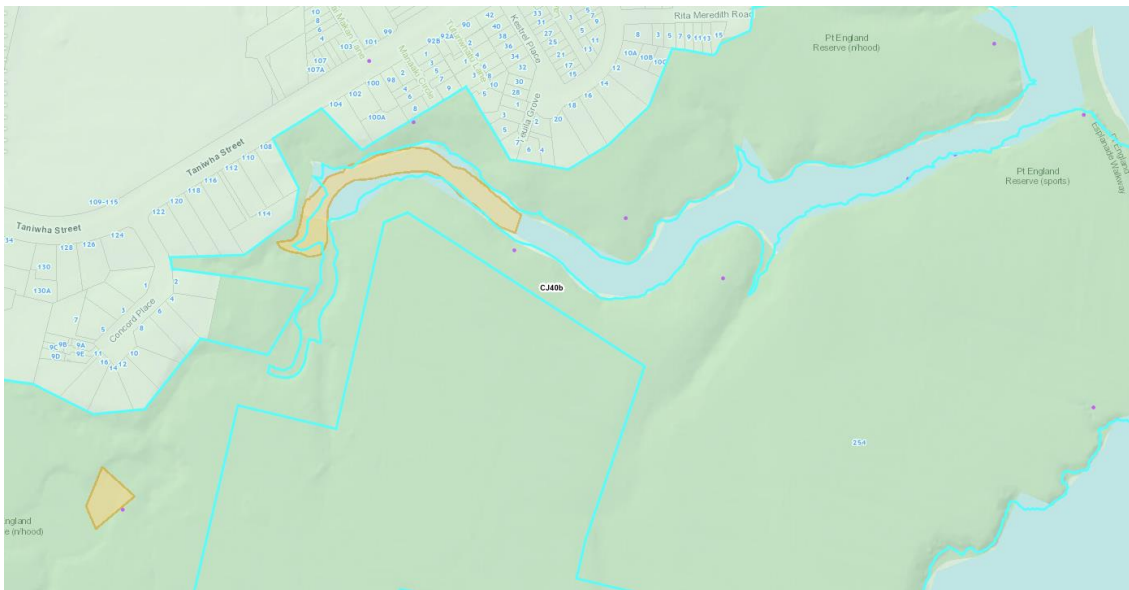
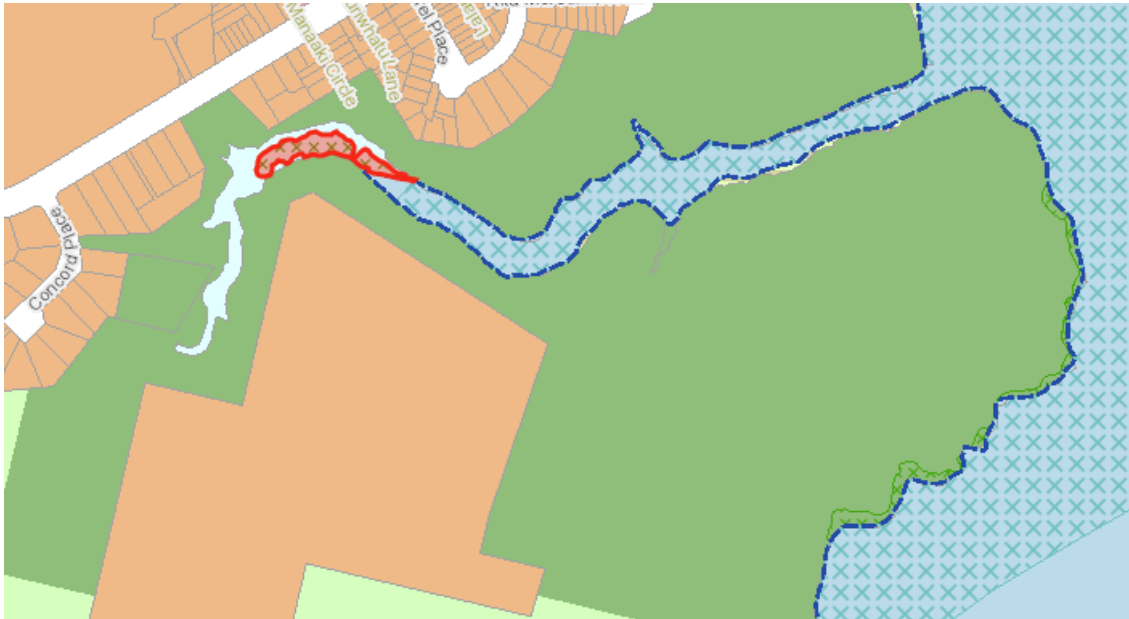
NES-F 42(1): Vegetation clearance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it is for the purpose of constructing a wetland utility structure.

NES-F 42(2): Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it is for the purpose of constructing a wetland utility structure.

Please acknowledge these reasons for consent in an updated AEE and provide an assessment of effects.

An initial response has been provided via email. Is question is related to question 16 below with a full response provided to that question.

6. Please confirm if any works are occurring within both the SEA_T_3140, Terrestrial (in red) and wetland (in orange).



No works are proposed in the areas identified.

7. Please confirm if there will be any vegetation or removal undertaken within a 100-year ARI floodplain as per E15.6.8. Therefore, triggering Table E15.4.1 (A23) for permitted activities in Table E15.4.1 that do not comply with one or more of the standards in E15.6.

It is confirmed that there will be limited tree alteration / removal in the 100 year ARI floodplain. This includes:

- At the 27m long boardwalk - the removal of a fallen tree will be required plus some smaller 1-2m tall plants
- At the 17 m long bridge – the removal of one karo, which is growing from under the bridge

E15.6.8 states: Vegetation alteration or removal undertaken within the 100-year ARI floodplain (1) Vegetation alteration or removal must ensure that erosion control measures associated with vegetation removal and replanting, such as mulch or bark, are not able to be swept off-site in a flood event.

No erosion and sediment control measures are proposed that will use mulch or bark.

8. I believe that Table E15.4.1 (A18) 'Vegetation alteration or removal within 20m of a natural wetland, in the bed of a river or stream (permanent or intermittent), or lake' will also be triggered as a further reason for consent. Please confirm and provide an assessment of effects.

No instream or wetland works are proposed. The mangrove area is not considered to meet the definition of natural wetland because it is a saline rather than freshwater ecosystem. All works that are undertaken in the riparian yard or close to waterbodies will be managed to ensure that any potential adverse effects on these is managed appropriately. Provided silt and sediment control measures proposed are adhered to the proposal will not have any adverse impacts on the nearby receiving environments.

Noise Requests

9. The noise intensive activities related to the proposal may be from the following activities: Tree removal/trimming, and chipping (if done on site), earthworks and construction of pathways and bridges.

The majority of the new path is located away from the adjacent residents in large separation distances, however in some sections, the new walkway is in close vicinity to the adjacent houses such as TP1, TP6, this means that the construction works may have potential to exceed the AUP permitted noise limit, given typical earthwork plant can make noise up to 70-75 dB LAeq at 10m, and the chain saw/wood chipping noise would be a lot louder, the applicable AUP permitted noise limit is 70 dB LAeq (for project duration longer than 20 weeks).

Therefore, the application in term of noise may not be a permitted activity, and further noise assessment is required. Please provide an assessment confirming compliance with chapter E25 in the form of a noise and vibration assessment or a statement from an acoustic specialist that the works will not exceed the permitted standards.

The construction permitted noise limits are as below:

| Time of week | Time Period | Maximum noise level (dBA) | |
|--------------|-----------------|---------------------------|------------------|
| | | L _{eq} | L _{max} |
| Weekdays | 6:30am – 7:30am | 60 | 75 |
| | 7:30am – 6:00pm | 75 | 90 |
| | 6:00pm - 8:00pm | 70 | 85 |
| | 8:00pm - 6:30am | 45 | 75 |

The proposed works time is 7:30am until 6pm which gives a L_{eq} of 75 and L_{max} of 90dBA.

The proposed works with a chainsaw has a sound power level of 105dBA average(L_{eq}) or 125dBA at full throttle (L_{max}).

There is a general noise reduction of 5dBA per 100m and a timber fence will reduce sound by 25dBA.

The houses are typically around 100m from where a majority of the tree removals works take place. This means that the L_{eq} noise will be 105 – 25 – (1×5) = 75dBA.

This means that noise will typically be within the permitted noise limits. However, a letter drop will be carried out to all neighbouring properties before the start of works and before prolonged noisy works including the removal of the pine trees at approx. CH120 on TP6 where letter drops to 40-58 (even numbers only) will be carried out informing them of the specific works.

It is anticipated that the duration for arboricultural works is as follows:

- Generally: a few hours of tree cutting for small to medium trees in one area.
- Group of pine trees: a week of work.

Archaeology Requests

10. It is noted that the submitted report is a “preliminary” archaeological assessment. In the report, the applicant’s archaeologist states that “At the time of writing construction details for boardwalks and bridges were unavailable other than that timber piles either concreted into post hole or driven will be used”. The construction methodology is now available and has been submitted with the application.

Can the applicant please provide an archaeological assessment that is not “preliminary”?

Additionally, this updated assessment needs to occur alongside consultation with the relevant iwi groups.

Please find attached.

Regional Earthworks (09/07/24)

11. Please provide a plan set of the proposed pathway, boardwalks and bridges which are proposed as a part of this application only (removing any portions of the pathway proposed under different applications/ stages).

Please refer to Revision 4 of the drawings as attached.

12. Please provide a construction methodology which only covers the works under this proposal, this will ensure the actual proposed works are assessed appropriately.

Please note, that the bridges proposed over a permanent or intermittent stream bed (wetland), if proposed under this application, will require assessment against E3 standards.

Please refer to updated CM&ESCP Revision 1. There are numerous structures over streams and the following assessment is provided against E3:

Activity Table E3.4.1 (A29) states that bridges or pipe bridges complying with the standards in E3.6.1.16 are a permitted activity outside the applicable overlays. None of the bridge / boardwalk structures are in any of the overlays listed. An assessment of these is provided as follows:

- **The activity will comply with the standards in E3.6.1.14, as follows:**
 - **The length of the structure is less than 30m measured parallel to the direction of the waterflow. The maximum length (width) of the boardwalk / bridge structures is 3.5m.**
 - **No erosion or scour management works are proposed.**
 - **The new structure do not progressively encase or otherwise modify the bed of the stream.**
 - **During construction bed disturbance is not anticipated.**
 - **The structures do not impede the passage of fish**
 - **The structures will not cause more than minor bed erosion, scouring or undercutting immediately upstream or downstream.**

- Construction materials or ancillary structures are not anticipated to be located in any stream bed during construction, but if so, they will be removed following completion of the activity.
 - The activity will not increase the height or storage capacity of any existing dam
 - The 1 percent AEP flood will be accommodated by the structures and / or overland flow paths without increasing flood levels up stream or downstream of the structure.
- Piles will not be located in, on or under the bed of the lake, river, stream or wetland.

13. Please demonstrate on a separate plan the indicative location of the proposed earthworks and the location of the identified wetland, including setbacks.

Please see response to Q15 below confirming that a further site investigation has found the small degraded potential wetland area is not wetland. As such no separate plan is required for works in this area.

14. Please demonstrate on a separate plan the indicative location of the proposed earthworks, including permanent or intermittent streams, overland flowpaths and associated structures i.e. bridges.

Please refer to Revision 4 of the drawings as attached.

15. Please provide supporting information to how the exotic wetland area was identified and delineated, noting a rapid assessment was proposed.

Identification of potential and actual natural wetlands within and nearby the works areas within 100m of the site were assessed in accordance with the wetland delineation protocols outlined in the NPS-FM 2020 – amended January 2024. This includes a desktop phase and site assessment. At the desktop stage streams, overland flow paths and floodplains were identified as potential wetland areas. The site walkover showed wetlands to be largely absent from the site. The approximate extent of the potential wetland originally identified was established based on visual observations of the vegetation via rapid assessment. This was based on viewing vegetation (willow weed which was present at the time) from the top of the bank during the site assessment in February 2024 however was not formally delineated. However, a site assessment on 14 August 2024 confirmed the area did not meet the definition of natural wetland. The area was dominated by buttercup (a facultative plant) and is associated with a stormwater outfall. The ground was firm and too hard to dig into to assess the soils. The area surrounding the outfall and intermittent stream in this location was lined with rocks and the soil alongside very dry and compacted. As such it is now confirmed that this area is not in fact wetland

and works in this area therefore do not constitute works within 10 or 20m from wetland. See site photos below of the area.



Additional requests (12/07/24)

16. After reviewing the NPS-FW, the definition of natural inland wetland excludes a coastal marine area (CMA). As per the definition below:

natural inland wetland means a wetland (as defined in the Act) that is not:

- (a) in the coastal marine area; or
- (b) a deliberately constructed wetland, other than a wetland constructed to offset impacts on, or to restore, an existing or former natural inland wetland; or
- (c) a wetland that has developed in or around a deliberately constructed water body, since the construction of the water body; or
- (d) a geothermal wetland; or
- (e) a wetland that:
 - (i) is within an area of pasture used for grazing; and
 - (ii) has vegetation cover comprising more than 50% exotic pasture species (as identified in the *National List of Exotic Pasture Species* using the *Pasture Exclusion Assessment Methodology* (see clause 1.8)); unless
 - (iii) the wetland is a location of a habitat of a threatened species identified under clause 3.8 of this National Policy Statement, in which case the exclusion in (e) does not apply

So, in this instance, if the CMA encompasses the entire water course, then the NES-F will not be applicable nor the other AUP rules which regulate setbacks to wetlands.

The RMA definition of a CMA is defined below:

coastal marine area means the foreshore, seabed, and coastal water, and the air space above the water—

- (a) of which the seaward boundary is the outer limits of the territorial sea;
- (b) of which the landward boundary is the line of mean high water springs, except that where that line crosses a river, the landward boundary at that point shall be whichever is the lesser of—
 - (i) 1 kilometre upstream from the mouth of the river; or
 - (ii) the point upstream that is calculated by multiplying the width of the river mouth by 5

To rule out if any triggers for inland wetlands apply, I need to understand the extent of the CMA surveyed as per the definition above. Was this carried out as a part of the application process?

Council has identified the Indicative Coastline on the unitary plan maps with the upstream point being where they have identified the Coastal Marine Area (CMA) / river boundary point. The CMA definition is normally no further than 1km upstream or the lesser of 5 times the stream mouth width upstream. It appears for this site the Council has identified this is greater than this. As such the CMA boundary as defined by the definition does not extend further into the area in question. However, it is clear from the aerals and site that the channel is still more saline than freshwater given the presence of mangroves in the channel. Mangroves are also growing within or along the edges of the channel for another 100m upstream of the upstream end of the SEA. At this site, the area is functioning more as a tidally influenced river than a wetland. As such it is still considered the NES-F triggers do not apply.

Context:

The below information has been provided by Council in regard to the terrestrial SEA. It passes criteria 4C Migration pathway. This is as it is a continuation of mangrove vegetation in the CMA. It had been considered part of the Coastal protection area prior to the Unitary Plan.

Omaru Creek, Point England - The ARC's Regional Plan Coastal identifies the marine vegetation of the Omaru Creek as a Coastal Protection Area. To be consistent with the Regional Plan: Coastal, the marine vegetation above the arbitrary limit of the Coastal Marine Area needs to be identified. The mapped area at Omaru Creek includes the mangrove and saltmarsh areas upstream of the rivermouth boundary as shown in the Regional Plan: Coastal.

- As a side note, I can't see a DIS number on SAP for this application. Can you confirm if this was lodged as an additional resource consent number? If not, please lodge this as an additional resource consent number on council's online portal and let me know when this has been completed.

This has been added into the system.

Ecologist Requests (05/08/24)

17. The proposal triggers consent under the Auckland Unitary Plan Rule E15.4.1(A22) for vegetation alteration or removal of greater than 25m² of contiguous vegetation and tree removal of any indigenous tree over 3m in height, that is within 150m of mean high-water springs. Please note that grass is considered as vegetation. The ecological assessment by SLR looked at the effects of vegetation removal and

mitigation proposals within the riparian yard and significant ecological areas (SEA) but does not appear to address the effects of vegetation removal outside of these areas and within 150m of mean high-water springs (MHWS). This vegetation provides ecological benefits including filtration and habitat provision.

- a. Please provide the area in m² of vegetation loss outside of the riparian yards and SEA's, but within 150m of MHWS.
- b. Please assess the effects and how these will be mitigated for.

The approximate vegetation clearance area that falls outside of the SEA and riparian areas within 150m of MHWS that is contiguous (and includes mown lawn and rank grass) is 2600m².

The vegetation contained in these areas is dominated by mown or grazed grass. Grass has negligible ecological values and provides limited ecosystem services. While it may provide some minor filtration for overland flows, the removal of the grass and replacement with a narrow path or boardwalk is unlikely to make any discernible difference in this function which will continue to be provided by surrounding vegetation. It is noted that these areas of vegetation removal are on upper banks with considerable vegetation on the lower banks, extending along almost the entire riparian corridor and coastline. Grass does not provide buffering nor benefit the vegetation integrity of the overall site.

The impacts of vegetation clearance outlined in the ecological assessment extend to include all vegetation clearance areas associated with the proposed track upgrade. Where ecological effects are negligible (which is the case for these areas that fall outside of the riparian yard and SEA) it is not necessary to mitigate for negligible ecological effects. The overall mitigation package has been increased and includes 464m² of track decommissioning and 872m² of native planting (see discussion under item 22).

18. A potential exotic wetland (5m²) is identified in the ecological assessment. It is proposed to move any proposed works to at least 10m from the wetland to avoid National Environment Standards for Fresh Water (NES-FW). However, under the Auckland Unitary Plan Rule E15.4.1(A18) consent will still be triggered for vegetation alteration or removal within 20m of a natural wetland.
 - a. Please identify this as a reason for consent.
 - b. Please advise what the effects may be and how they will be avoided, remedied or mitigated.

Please see the response to Q15 above confirming that following a further site assessment this area has been confirmed to not be natural wetland. As such, works within this area do not trigger an additional reason for consent.

19. From the ecological assessment it appears that 84m² of vegetation removal in an SEA along track TP6 is proposed with no mitigation. This includes some permanent loss of habitat with a 3m wide concrete path proposed.

a. Please justify and provide appropriate mitigation.

This area calculated was conservative and was based on the potential that either the pine trees or the small patch of planted native vegetation on the upper bank within the SEA would be removed. Council's reviewing arborist has since confirmed support for the pine removal.

The vegetation removal within the SEA is limited to the removal of seven pine trees in declining health. There is no native vegetation beneath the pines that will be impacted. The main ecological value of these pines is as bird perching habitat. Potential bird nesting in these trees is likely to be limited to exotic species. There is however extensive vegetation along the coastal margin and as such there is not anticipated to be any discernible ecological impacts from their removal.

Despite the limited ecological value of the pines, planting is proposed to mitigate for their removal. It is recommended that at least two canopy tree species are planted for each pine removed. Suitable potential species to plant include Pohutukawa, puriri and kowhai. The location for these 14 specimen trees is yet to be confirmed by the applicant to ensure it doesn't conflict with recreational use of the reserve. It is likely to be in between any existing or new planting that may be proposed alongside or nearby the new track alignment.

20. The proposal covers a variety of vegetation removal and mitigation areas and options and a restoration plan is proposed as a condition of consent. However, this forms part of the mitigation measures for vegetation loss, therefore, needs to be provided upfront to ensure adverse effects are appropriately managed.

a. Please provide a native revegetation planting plan or draft replanting plan (including pest plant and animal control). The planting plan must specify the weed/pest control to be undertaken and planting specifications proposed (including location, total area, species, size, spacing, density etc). Due to the range of effects and management in this proposal it may be appropriate to address the different sections separately (e.g. track section TP0 to TP9).

As part of mitigation, 464m² of track will be decommissioned and a 872m² area is proposed to be planted. This planting area has been increased from what was originally proposed (see further comment under item 22). This includes 14 native canopy tree specimens that will be planted within this area as replacement for the 7 pine trees to be removed.

All plants are to be selected in accordance with Auckland Council's Streamside Planting Guide for areas within 10m of streams and the Coastal planting guide as appropriate for each of the planting areas and in keeping

with the Puriri forest ecosystem type. A baseline plant species schedule is indicated below.

| Common name | Scientific Name | Plant grade | Spacing | Approximate % |
|---------------------------|-------------------------------|-------------|---------|---------------|
| Toetoe | <i>Austroderia fulvida</i> | 1L/PB3 | 1m | 5 |
| Cabbage tree | <i>Cordyline australis</i> | 1L/PB3 | 1m | 5 |
| Koromiko | <i>Hebe stricta</i> | 1L/PB3 | 1m | 4 |
| Kanuka | <i>Kunzea robusta</i> | 1L/PB3 | 1m | 17 |
| Manuka | <i>Leptospermum scoparium</i> | 1L/PB3 | 1m | 17 |
| Karamu | <i>Coprosma robusta</i> | 1L/PB3 | 1m | 17 |
| Mahoe | <i>Melicytus ramiflorus</i> | 1L/PB3 | 1m | 17 |
| Mapou | <i>Myrsine australis</i> | 1L/PB3 | 1m | 8 |
| Harakeke/NZ flax | <i>Phormium tenax</i> | 1L/PB3 | 1m | 4 |
| Putaputaweta | <i>Carpodetus serratus</i> | 1L/PB3 | 1m | 1 |
| Whauwhaupaku/ five-finger | <i>Pseudopanax arboreus</i> | 1L/PB3 | 1m | 4 |
| Pigeonwood | <i>Hedycarya arborea</i> | 1L/PB3 | 3m | 1 |
| Pūriri | <i>Vitex lucens</i> | 8L | 5m | TBC |
| Kohekohe | <i>Dysoxylum spectabile</i> | 8L | 5m | TBC |
| Rewarewa | <i>Knightia excelsa</i> | 8L | 5m | TBC |

Some pest control is already undertaken by Council in the reserve but some weed species (e.g. hawthorn, brush wattle) and larger weed infestations (e.g. the Chinese privet alongside the intermittent stream) are not controlled and this is the reason why some weed control has been proposed as part of the mitigation package. As outlined in the ecological assessment this includes ensuring weeds do not invade into the decommissioned tracks and weed control is completed to prepare areas for planting, where required.

Animal pest control is already undertaken in the reserve as part of the existing parks maintenance contract for both rats and possums. Conservation volunteers also undertake rat and possum trapping in the reserve. As such no additional animal pest control is proposed as part of the mitigation package for the proposal.

- The scale of vegetation clearance and the possibility of native lizards being present are considered to require a lizard management plan. Copper skinks have been recorded within 2km of the site. While some parts of the proposed works are being undertaken on mown grass, other areas contain potential lizard habitat- for example up to 800m² of vegetation clearance is proposed on track TP2 in the riparian margin.

- a. Please provide a lizard management plan showing the areas where and how lizard management will be undertaken.

Based on our review of the 2020 Lizard Records as provided by Auckland Council the closest lizard recording is for copper skink at least 2.5km away at St Johns Bush. There is a high level of urbanisation in between with a lack of continuous vegetation. It is assumed council must have more recent records if one has been recorded within 2km of the site. As indicated in the ecological assessment the most likely lizard present is the exotic pest plague skink. The potential presence of copper skink is considered low and if present they are likely to be in low numbers as indicated in the ecological assessment.

A draft Lizard Management Plan (LMP) is currently being prepared and will be provided before the end of August or early September for review.

Additional concerns that are not S92 matters, but are likely to be raised in the review of the applications (the applicant may wish to address through the application process):

22. The information provided within the ecological assessment suggests that about 3300m² of vegetation clearance (including grass) is proposed of which about 1120m² is within either SEA or riparian yard and that only around 412m² of mitigation planting is proposed and possibly- though not explicitly stated, a similar, overlapping area of weed control is proposed. The objectives of chapter 15 of the Auckland Unitary Plan include maintaining or enhancing the ecosystem services and biological diversity values, particularly in sensitive environments. Also, that indigenous biodiversity is restored or enhanced in areas where ecological values are degraded or where development is occurring.
 - a. The mitigation proposed does not appear commensurate with the effects of vegetation removal. Please consider additional mitigation or justification of mitigation proposed.

Total vegetation removal areas over the entire site for the track cover 3610m². Of this 3163m² is in the SEA, riparian yard and within 150m of MHWS. This predominantly is made up of mown grass or grazed pasture which covers approximately 65% of the site. 15% of mixed native/exotic shrubby vegetation and 11% is made up of weeds or rank grass. And the remaining 9% is within the existing track alignment.

Due to the negligible ecological values of the grazed pasture and mown grass and narrowness of the areas being removed it is not considered necessary for any mitigation to be proposed for loss of these areas. An area for area replacement ratio is proposed as mitigation for the remaining vegetation removal areas comprising of track decommissioning, revegetation within construction works area and additional planting outside of these.

Approximately 464m² of track decommissioning is proposed that will be left to regenerate with some minor infill planting. These tracks will be

subject to weed control to ensure weeds do not invade these areas. This is the only area where weed control with limited planting is proposed. All other weed control areas are proposed to be revegetated with suitable native vegetation at approximately 1m spacing.

The recommended mitigation planting area has been increased to 872m² being the balance after taking into account the track decommissioning. Approximately 142m² is proposed surrounding the bridge/boardwalks on track section TP0 and TP3. Revegetation planting of up to 170m² is proposed for the potential construction clearance area alongside the realigned bridge on TP4. The location for the remaining shortfall area has yet to be confirmed and will be subject to the Council Parks team ensuring it does not conflict with intended use of the park. Suggested locations are in the currently weedy area between the new path and bush area to the south of TP1, a longer length alongside the intermittent stream that TP3 crosses (currently dominated by Chinese privet), and/or a buffer width to widen the existing vegetation along the coastline of TP4 and TP6.

Additional response:

Arboricultural matters.

Following a site visit between our arborist and regulatory services arborist and the subsequent email of 5 August 2024, the arboricultural assessment has been updated and is attached.

Please contact me if you would like to discuss any of the response provided.

Yours faithfully



Graham Hooper
Principal Planner – Parks and Community Facilities