

**BEFORE THE ENVIRONMENT COURT
AT AUCKLAND**

**I MUA I TE KOOTI TAIAO
I TĀMAKI MAKĀURAU ROHE**

ENV-2024-AKL-000

UNDER the Resource Management Act 1991 (**RMA**)

IN THE MATTER of an application under section 311 of the RMA for a declaration as to the activity status of subdivision in Chapter E39 Subdivision – Rural of the Auckland Unitary Plan (Operative in Part) (**AUPOP**)

BETWEEN **CATO BOLAM CONSULTANTS LIMITED**
BETTER LIVING LANDSCAPES LIMITED
WARKWORTH SURVEYING LIMITED
FLUKER SURVEYING LIMITED
BUCKTON CONSULTING SURVEYORS LIMITED
TERRA NOVA PLANNING LIMITED
PARALLAX CONSULTANTS LIMITED
Applicants

AND **AUCKLAND COUNCIL**
Consent Authority

**AFFIDAVIT OF MYLES DESBOROUGH GOODWIN IN SUPPORT OF
APPLICATION FOR DECLARATION**

21st MAY 2024

Hornabrook Macdonald Lawyers
Level 5, 12 O'Connell Street
Auckland
Solicitor acting: Samantha Hiew
Counsel acting: Kitt Littlejohn

DX CP 21015
PO Box 91845
Phone [09] 353 7999
Fax [09] 353 7599

I, **MYLES DESBOROUGH GOODWIN**, ecologist/planner, of Auckland, swear:

Introduction

1. My name is Myles Desborough Goodwin and I am a Director and Ecologist/Planner at Cato Bolam Consultants Ltd.
2. I have a MSc (1st class honours) in native plant ecology from Auckland University and a BSc in Environmental Management. For my MSc thesis I studied the habitat values of native understorey regeneration in pine plantations in Northland.
3. I have worked for Cato Bolam Consultants Limited (**CBCL**) for the last 24 years, specialising in rural environmental enhancement and land subdivision, with the bulk of my work being in the Rodney area. I also grew up on a farm in Northland and have significant farming experience. My role involves visiting mainly rural land owners with the potential to subdivide, advising on the quality of bush and wetland areas and any restoration needed, and designing subdivision applications to ensure the protection of the natural areas, while meeting the needs of the landowner.
4. I am authorised to give this affidavit on behalf of CBCL and in support of the application for declaration.

Scope of declaration and issue

5. Together with a number of other planning and surveying companies, CBCL has applied for a declaration in relation to the status of subdivision in Chapter E39 Subdivision – Rural of the AUPOP. Specifically, the declaration asks whether certain types of rural subdivision activities should be processed as a (restricted) discretionary activity or as a non-complying activity.
6. Further details about the types of subdivision activity addressed by the declaration application and the issues the applicants seek to have clarified by the Court are set out in the affidavit of Trish Giles. I agree with her summary and the background she has set out.
7. The purpose of my affidavit is to describe other examples of protection/incentive based subdivision applications that I have been involved in where the 'continuous, single area' interpretation is being insisted on by the Council.

Example 1 of Council approach to rules in question

8. CBCL is providing advice on a wetland protection subdivision. The areas of wetland to be protected exceed the minimum area of 5000m² required for a single new title in Table E39.6.4.4.1, however the wetland is contained in several connected portions as shown in the image below.

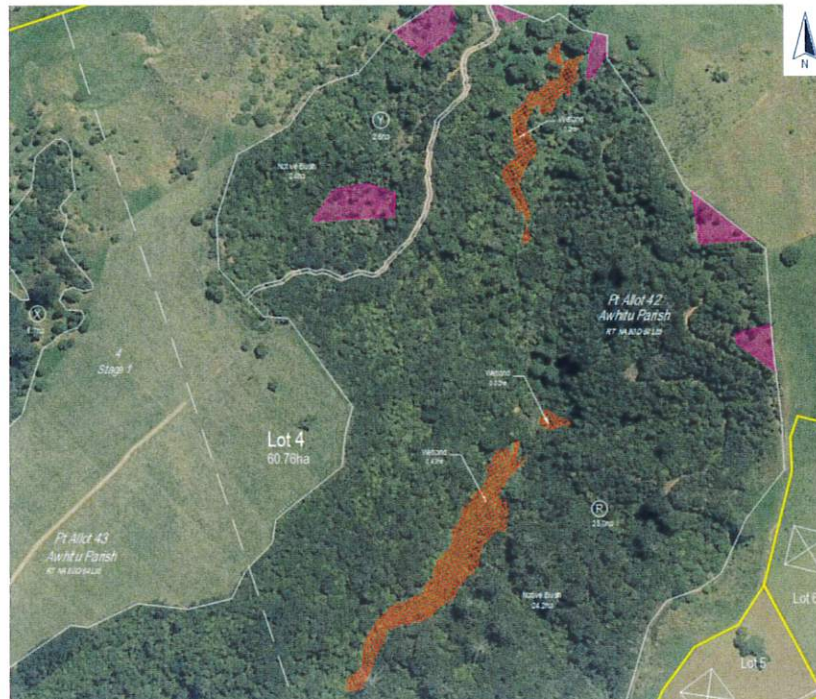


9. The wetland on the site in question is of good quality. There is a legal road through it, and the wetland forms a continuous area, some on one side, the wetland in the legal road, and then some on the other side.
10. The Council consider that the wetland is not continuous, and is in eight separate parts, two in the legal road and six on the client's property as per the plan above. On my assessment the wetland to the east of the crossing is a single area, and there is over 0.5ha of the wetland on our client's property on the east side of the crossing. Therefore, there is over 0.5ha of continuous significant wetland.
11. However, the Council consider the legal road creates a break even though it will never be formed (there is a road on the ridge to the north and south that accesses all properties), and the NES:FW would not allow the removal of this wetland in any event.
12. The AUPOP does not, as I see it, require that the wetland be continuous in area. Therefore, the areas of wetland shown in blue, which sum to over 0.5ha, should form the basis of a subdivision in accordance with rule A16. If the AUPOP was applied as it is written, with there being no requirement for the wetland to form one continuous area, this subdivision application would be granted as a restricted discretionary activity. The Council have not indicated any issue with wetland quality; just the fact it is comprised in separate areas.
13. This Application is currently sitting in Council on hold waiting for clarification on the interpretation of these rules.

el mth

Example 2 of Council approach to rules in question

14. Another example also concerns a wetland protection proposal in Awhitu that CBCL was involved in in 2021 (see below).



15. The total area of wetland involved was 0.63ha, all close together in the same gully connected by a stream. The main area was 0.43ha with another 0.2ha area about 160m downstream. All is very good quality. Curiously, neither it, nor the bush in the gully were pre-identified as Significant Ecological Area (SEA) overlay, despite other areas all around it being of similar quality and being shown as SEA.
16. CBCL initially applied for a wetland protection title on the basis that measurements made from an aerial photo indicated a single area that was over 0.5ha. However, after some discussions with Council, we went out and surveyed the area, and this showed a 0.43ha main area. At the same time, we surveyed other wetland areas downstream and prepared the plan above. There was never any question about the quality of the additional areas. The issue/argument was all about the fact that there was not a continuous 0.5ha area of wetland, and that Council was applying the rules to require a continuous 0.5ha area.
17. I recall we had the argument with Council over the interpretation of the rule and whether it required the area of feature to be protected to be a single continuous area at the time. A discussion of the Court's wording in its 2021 decision also took place (see e-mail chain attached and marked "A") with the Council officer involved stating:


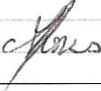
A handwritten signature in blue ink, appearing to be 'C. M. B.', located at the bottom right of the page.

The Court has not specified that the current practice of requiring the minimum area threshold for either indigenous vegetation, being identified as SEA or SEA equivalent, or wetland, being SEA or SEA equivalent, as specified within Table E39.6.4.4.1 having to be met should not continue.

18. Essentially, the position is that 'because the Court didn't say we couldn't, we will continue to do this', despite the fact that the specific wording of the AUPOP provisions make no mention of it.
19. Ultimately, due to financial and other pressures, our client decided to reduce the title yield by one in the interests of getting the consent issued. Hence, no title from the 0.5ha + area of wetland present was sought.

Conclusion

20. In my opinion there is nothing in the AUPOP to support the Council's interpretation of the E39 Subdivision – Rural rules. To the contrary, Objective E39.2(14)(a) and Policy E39.3(15)(b) are focussed on limiting the creation of in-situ sites to situations where indigenous vegetation is protected. The method to achieve that policy is set out in the rules noted above and Standard E39.6.4.4, and it is the total area being protected that justifies the additional lot(s).
21. I consider that Council's interpretation is not supported by the plain words of the provisions and that the interpretation is directly contrary to the policy intent of the AUPOP.

AFFIRM	
SWORN at	this 21st
day of May 2024 before me:	
KATHLEEN ANNA JONES	
	M D Goodwin
A Barrister/Solicitor of the High Court of New Zealand or Justice of the Peace	

K A JONES J.P.
#4144
AUCKLAND
Justice of the Peace for New Zealand



This is the annexure marked "A" referred to
within the Affidavit of Myles Desborough
Goodwin sworn at

on 21st May 2024 before me:

KATHLEEN ANNA JONES

K A JONES J.P.

#4144

AUCKLAND

Justice of the Peace for New Zealand

.....
Justice of the Peace/Barrister/Solicitor of the
High Court

"A"

From: Myles Goodwin <IMCEAEX-_O=CATOBOLAM_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29_CN=RECIPIENTS_CN=6187FECDE61047719A8B3CC1AF2967C6-MYLES+20GOODWIN@AUSP282.PROD.OUTLOOK.COM>
Sent: Friday, 30 July 2021 2:07 PM
To: Karl Anderson; Debbie Tilley
Cc: Allister Knight
Subject: FW: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Hi Karl, interesting interpretation. Looks a bit of a stretch. So Council say that "The Court has not specified that the current practice of requiring the minimum area threshold for either indigenous vegetation, being identified as SEA or SEA equivalent, or wetland, being SEA or SEA equivalent, as specified within Table E39.6.4.4.1 having to be met should not continue". The Court did not specify a lot of other things should not continue. The Court cannot specifically address every old practice that should no longer continue. The Court finalised a new set of rules, with the expectation that they would be followed as written, hence no need to specifically address old practices. How can Council's position be upheld when the rule clearly does not have the word contiguous, and the Judge deliberately removed it and provided reasoning for removing it? The rule from the old plan clearly specified a contiguous area, hence the practice of that time. The Unitary Plan does not, hence old practices need to change.

You mentioned the likelihood that the final decision on this one would go to a commissioner because of landscape issues. Is this issue one the commissioner could also rule on?

Regards
Myles

From: Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>
Sent: Friday, 30 July 2021 10:51 am
To: Myles Goodwin <MylesG@catobolam.co.nz>; Debbie Tilley <DebbieT@catobolam.co.nz>
Cc: Allister Knight <allister@hamlid.co.nz>
Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Morning Myles

Thanks for your patience. Given the nature of the issue this has been circulated through a few channels (principal planning team, policy team & our legal counsel that were involved in the hearings) in order to be absolutely sure of Council's position. Following these discussions, Dan Rodie has prepared a response and I have copied this verbatim below.

In its February 2021 decision, when the Court addressed the two proposed versions of the explanatory note under Table 39.6.4.4.1 submitted by council and the appellants, the Court stated that it had not specifically addressed the requirement for the areas of SEA and areas qualifying as SEA to be contiguous on a site in order to qualify as SEA for protection. It then went on to say that "*We cannot see the grounds for a change of the kind now being sought by the Council and it would seem to reduce the protection afforded existing identified and qualifying SEA. We accept the Appellants arguments on this matter*"

In making its decision the Court took into account the memorandum filed with the Court on behalf of appellants in January this year including Cato Bolam, which states: "*Counsel is instructed to clarify that the Council's proposal above departs from the historic application of similar rules in the legacy plans, and is inconsistent with current practice, whereby, provided the initial area threshold for the first lot is met, the*

total area of feature to be protected (and thus the lot yield from the subdivision) is calculated by aggregating all areas of bush or wetland on the application site."

The Court has not specified that the current practice of requiring the minimum area threshold for either indigenous vegetation, being identified as SEA or SEA equivalent, or wetland, being SEA or SEA equivalent, as specified within Table E39.6.4.4.1 having to be met should not continue.

The council will continue to apply the provisions as per the current practice which was drawn to the Court's attention by the appellants including Cato Bolam.

With reference now to this application, Council's position is that the two separate wetland areas cannot be combined to form the initial wetland area threshold. Moving forward, I will either need to finish processing this as a non-complying activity that doesn't meet the minimum area requirements for the lot yield proposed (I would be recommending refusal for this), or you may wish to alter the proposal to reduce the lot yield so that you are not relying on the wetland component.

Ngā Mihi | Kind regards,

Karl Anderson | Intermediate Planner
Resource Consents South
Mobile 027 210 9865

From: Myles Goodwin <MylesG@catobolam.co.nz>

Sent: Tuesday, 27 July 2021 12:59 pm

To: Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>; Debbie Tilley <DebbieT@catobolam.co.nz>

Cc: Allister Knight <allister@hamlid.co.nz>

Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Hi Karl, this is somewhat of a surprise. So is Council going against a specific direction from the Court? The statement below saying that existing practice will remain seems to ignore the fact there is a new Unitary Plan, with new rules in place. Council cannot simply ignore the rules and say an existing practice that contravenes the rules will apply. This seems to be Council's position. Is that correct?

Please see attached snips of the relevant part of the decision. Council specifically tried to add in the word "contiguous" late in the piece when discussion of SEA areas occurs. However, as you can see from the attached, the Court specifically rejected the requirement for areas of SEA or SEA quality to be contiguous. Therefore the final wording does not have the requirement for areas to be contiguous. The Court said "we cannot see the grounds for a change of this kind - - ". Therefore it is clear that the Court was seeing this wording as introducing a change from allowing separate areas, to the areas having to be contiguous. The Court rejected this change, thus allowing for the use of separate areas.

Not quite sure what you mean by wetland being referred to in the singular. E39.6.4.4 states "In-situ subdivision creating additional sites through protection of indigenous vegetation or wetland identified - - -". The wetland is the wetland we have identified. It just happens to be in two bits. It is still referred to as "the wetland" in common English. The term in this usage is both singular and plural. The same applies to other times wetland is referred to.

As far as we can see, paragraphs 15 – 17 of the Court decision make no reference to areas being contiguous or not. In what way is Council seeing these paragraphs as supporting a case that areas need to be contiguous, when the decision clearly says they do not have to be?

Regards
Myles



Myles Goodwin
Director
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From: Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>
Sent: Tuesday, 27 July 2021 11:57 am
To: Myles Goodwin <MylesG@catobolam.co.nz>; Debbie Tilley <DebbieT@catobolam.co.nz>
Cc: Allister Knight <allister@hamlid.co.nz>
Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Hi Myles

Our ecology team have reviewed your reply and have taken another look at the area. Their measurements are still coming up smaller than 0.5ha (including a few metres beneath the tree cover as shown on the previous plan).

I have also referred the second part of your email (i.e. reference to paragraphs 24-28 of the February 2021 decision) to our principal planning team for discussion. It is Council's firm view that the qualifying area for a wetland cannot be made up of more than one wetland area, as within Rule E39.6.4.4 wetland is referred to singularly and this is also the manner in which wetland is referred to in paragraphs 15-7 of the February 2021 decision. This has been brought up by another consultant recently and Dan Rodie has previously provided the following response:

The Resource Consents Team are aware of the Court's comments in relation to the council's proposed version of the advice note to follow the Table E39.6.4.4.1.

To clarify, the council's existing practice will remain. That is, with respect to the protection of indigenous vegetation, being either SEA or meeting one of the SEA factors, the minimum area thresholds within the table must be met by one contiguous area of qualifying indigenous vegetation and then the next area threshold can be met through the addition of other non-contiguous areas of qualifying indigenous vegetation.

This reflects the appellants understanding of how the provisions are being applied as set out within the memorandum filed with the Court on behalf of appellants in January this year, which states:

"Counsel is instructed to clarify that the Council's proposal above departs from the historic application of similar rules in the legacy plans, and is inconsistent with current practice, whereby, provided the initial area threshold for the first lot is met, the total area of feature to be protected (and thus the lot yield from the subdivision) is calculated by aggregating all areas of bush or wetland on the application site."

With respect to the protection of wetland meeting the qualifying status it is council's existing practice that each qualifying wetland feature must meet each of the area thresholds. We consider the Court comments at paragraphs 15 – 17 of its February 2021 decision and wording of the note support this approach.

Council's position is that there is not enough wetland to qualify for this additional title.

FYI when I spoke to Rue he did mention that his time out at 394 Awhitu Central was going to be non-chargeable.

Ngā Mihi | Kind regards,

Karl Anderson | Intermediate Planner
Resource Consents South
Mobile 027 210 9865

From: Myles Goodwin <MylesG@catobolam.co.nz>
Sent: Monday, 26 July 2021 3:36 pm
To: Debbie Tilley <DebbieT@catobolam.co.nz>; Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>
Cc: Allister Knight <allister@hamlid.co.nz>
Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Hi Karl, we have been relooking at this. We believe that the area identified in red hatch on the auditing ecologists plan is wetland. We agree that it could be considered part of the broader stream bank, but it is kept wet by seepages from the bank and is covered in wetland vegetation, and meets every definition of wetland. We are not aware of any rule that says a wetland has to be flat. Therefore our starting position is that all of the area we have identified is wetland.

However, we have also relooked at the plan of the wetland you supplied. We have recreated this as per the attached plan. We have tried to make this as identical as possible. The area we come up with is 5,060m². Note that one area of difference has been identified by the yellow highlighted area. We note that the auditing ecologist has excluded this approximately 134m² area, presumably based on the contour data. However, on site, and as is apparent from the aerial photos, this area is a flat area that is wetland. We would suggest that in this area the contour data is incorrect. Given the location in a valley bottom, and the possible overhanging vegetation cover present, this is perhaps not surprising. Contour data is only in 1m intervals in any case, assuming that it is accurate. Therefore based on a combination of our information obtained in the field, and the information obtained by the auditing ecologist, there is over 0.5ha of wetland present within RA.

The fact that GPS measurements were taken is mentioned. If using a hand held GPS in a deep valley (limited satellite availability), with tree cover, we doubt accuracy would be any better than 10m, which would make a significant difference in regard to total area. Therefore it cannot be relied on for fine measurements.

However, even assuming that there is only 0.46ha of wetland present in this one area, the rules of the Unitary Plan are clear that a wetland does not have to be a contiguous area. This is backed up by the comments from Judge Smith made as part of the appeals process, who confirmed that wetland and bush areas do not need to be contiguous. Therefore separate areas can be used to make up the 0.5ha area. As identified on the scheme plan, there is at least a further 0.1ha of wetland downstream of the main wetland area that is of a similar quality to the main area, and covered by the same vegetation types. This would bring the total area to over 0.56ha, assuming the 0.46ha area is correct.

There is also another area of wetland within the area of SEA shown as area Q. The attached plan shows this area. The area within the SEA is 1,257m², and the total area is 1,688m². We note that this 1,257m² area is not of as good a quality as the other areas identified but as the area is shown as SEA, no further assessment is required.

Therefore perhaps the easiest way forward at this time is for us to not dispute the 0.46ha area in the main wetland, but add the 0.1257ha area of wetland identified as SEA, for a total area of either SEA or SEA quality wetland of 0.5857ha. Therefore a title from the wetland is fully within the rules.

We trust our client will not be charged for time by two Council ecologists for the site visit.

Regards
Myles

Myles Goodwin

Director

09 427 0072 | 027 493 3022

catobolam.co.nz

From: Debbie Tilley <DebbieT@catobolam.co.nz>

Sent: Monday, 26 July 2021 11:58 am

To: Myles Goodwin <MylesG@catobolam.co.nz>

Subject: FW: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

From: Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>

Sent: Wednesday, 21 July 2021 3:23 pm

To: Debbie Tilley <DebbieT@catobolam.co.nz>

Cc: Allister Knight <allister@hamlid.co.nz>

Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Hi Debbie

Jessica visited the site last Thursday. Some thorough investigation was undertaken including some GPS surveying and it appears that the wetland does not meet the minimum area required to generate a lot (see response in italics below plus attached map). Do you have any other avenues you would like to explore for this site? If not, either the total lot yield would need to drop by 1 in order to meet the standards, or if you want to proceed with the subdivision proposal as-is while not meeting the minimum required bush/wetland areas then I would be recommending refusal.

If you are dropping a lot I would recommend dropping Lot 7 which has the most restrictions due to topography and flooding. Please let me know how you would like to proceed.

"See attached map of wetland boundaries based on last week's site visit. As indicated previously, the northern section marked as wetland by the applicant is actually an area of stream. The start and end points of the wetland were confirmed on site by GPS, with locations corresponding to the photos shown on the attached. We consider the area of 0.46ha shown is a conservative estimate of the total wetland extent, which may be narrower on the ground in some sections depending on variations in vegetation beneath the tree cover. As such, the wetland area, while of SEA standard, does not meet the minimum of 0.5ha to be eligible to protect for subdivision."

Note that Rue Statham also attended the site visit, and agrees with the extent of wetland mapped in the attached."

Ngā Mihi | Kind regards,

Karl Anderson | Intermediate Planner
Resource Consents South
Mobile 027 210 9865

From: Karl Anderson

Sent: Thursday, 8 July 2021 8:43 am

To: Debbie Tilley <DebbieT@catobolam.co.nz>

Cc: Allister Knight <allister@hamlid.co.nz>

Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Cheers Debbie

Just letting you know that the ecologist will need to head out on site to view the wetlands in more detail and to verify the minimum area is met – she has signalled that she is looking to go on site next week. Please let me know if there will be any issues with her accessing the site.

Ngā Mihi | Kind regards,

Karl Anderson | Intermediate Planner
Resource Consents South
Mobile 027 210 9865

From: Debbie Tilley <DebbieT@catobolam.co.nz>

Sent: Wednesday, 7 July 2021 11:21 am

To: Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>

Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Thanks for the update Karl, the client is progressing consultation with Karl Flavell along with Walters Road. We will provide an update as soon as that is complete.

Many thanks

Debbie



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From: Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>

Sent: Tuesday, 6 July 2021 3:27 pm

To: Debbie Tilley <DebbieT@catobolam.co.nz>

Cc: Allister Knight <allister@hamlid.co.nz>; Myles Goodwin <MylesG@catobolam.co.nz>

Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Hi Debbie

Just as a brief update – Jessica has confirmed that the stage 1 vegetation area info is sufficient and meets the requirements for the number of lots that are being generated. I'm waiting for confirmation on the wetland side of things as this area wasn't originally visited early on as wetlands weren't a crucial part of the application at that stage. Based on her review of the info provided it appears promising.

I believe all other s92 matters are satisfied – I'm just waiting on this final ecological confirmation from Jessica.

I have also had contact from Karl Flavell of Ngati te Ata, as we had to generate discharge and water permit consent numbers due to the consents required under the NES for the erosion and sediment control water diversions during driveway construction. These numbers went back onto the weekly application register and despite no mana whenua raising concerns when the application first came in, Karl has confirmed that he would like to engage with the applicant. I believe you are meant to be engaging with Ngati te Ata on the other property anyway – maybe you can discuss this one with him at the same time? He has asked for the applicant/agent to make contact (taiao@ngatiteata.iwi.nz). If you engage please let me know how it goes.

I'm going to get stuck into my reporting this week. Regarding the ONL issues, this is probably the key matter of contention for the overall development. At this stage I am leaning towards support based on the info that is available to me. I will be having a chat with policy team and the relevant specialist team leader to let them know – depending on these conversations I may need to have the decision deferred to a commissioner. I've already discussed with my team leader. I'll keep you updated.

Ngā Mihi | Kind regards,

Karl Anderson | Intermediate Planner
Resource Consents South
Mobile 027 210 9865

From: Debbie Tilley <DebbieT@catobolam.co.nz>

Sent: Thursday, 1 July 2021 7:25 pm

To: Karl Anderson <karl.anderson@aucklandcouncil.govt.nz>

Cc: Allister Knight <allister@hamlid.co.nz>; Myles Goodwin <MylesG@catobolam.co.nz>

Subject: RE: [#CBC 43604] BUN60372951 s92 Response 394 Awhitu Central Road Ecological queries

Hi Karl

Please see below and attached comments from the ecologist:

Please see attached examples of other smaller areas of standalone SEA. Therefore Council identified SEA areas of a similar areas to south east area V and area W exist. The identified areas are SEA 4442 (2,966m² – SEA factors 1, 2), SEA 5310 (near coast – 1,901m² – SEA Factors 1, 2, 3 4), SEA 5549a (864m² – SEA factor 2) and SEA 100 (3,030m² – SEA factor 1). Therefore the size of the areas is in-line with other areas of Council identified SEA.

We consider that the area to the south east of V and area W meet SEA factor 1 for Representativeness. Both areas are examples of indigenous ecosystems that contribute to the inclusion of at least 10% of the natural extent of the ecosystem type in the ecological district, and they are typical of ecosystem diversity in the Auckland Region.

Both areas could be considered to meet SEA factor 4, for stepping stone, migration pathways and buffers. The bit in area V is immediately adjacent to identified SEA, and will connect to identified SEA via planting. Both areas are part of a network of sites that cumulatively provide habitat for indigenous fauna and make an important contribution to the provision of a particular ecosystem in the landscape.

Kind Regards

Debbie