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18 February 2019

Deborah Manning  
18 West View Road  
Westmere  
Auckland 1022

Dear Deborah,

**RE: RESOURCE CONSENT APPLICATION TO REMOVE PINE TREES, WESTERN SPRINGS PARK, 859 GREAT NORTH ROAD, GREY LYNN**

Thank you for writing to me as a resident of West View Road, Westmere to request my feedback on the Auckland Council's application for resource consent concerning the Western Springs Forest. I understand that the Council has proposed to remove 200+ pine trees in a single removal operation, and that the application for resource consent is currently being considered by Hearing Commissioners under the Resource Management Act 1991 (RMA).

**Information provided**

The information you have provided to me about the resource consent application includes:

1. Assessment of Effects on the Environment and Statutory assessment, Western Springs Park: Pine Tree Removal, Mt Hobson Group, May 2018.
2. Applicant's response to Directions issued by Hearings Commissioners under s41C of the Resource Management Act 1991, in the matter of an application (LUC6032124) by Auckland Council Community Facilities for resource consent to remove pine trees at Western Springs Park dated 26 November 2018.
3. Statement of Evidence of Nicholas Paul Goldwater, Principal Ecologist at Wildlands Consultants Ltd for the hearing of an application (LUC6032124) by Auckland Council Community Facilities for resource consent to remove pine trees at Western Springs Park dated 26 November 2018.
4. Lizard Management Plan for Pine Removal at Western Springs Park, Wildlands Report R4582, December 2018, Prepared for Auckland Council.
5. Ecological Assessment and Management Plan for the Proposed Removal of Pines at Western Springs Park, Wildlands Report 3421A, June 2016 (revised February, May and June 2018).

At my request you also made an enquiry with Auckland Council as to whether there is an Ecological Management Plan (EMP) for the Western Springs Significant Ecological Area (SEA). I understand you were advised that there is no EMP for the Western Springs SEA.

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## **Assessment of alternatives and adequacy of information**

As you will appreciate, I have not had enough time to carry out an in-depth review of the full set of documentation associated with the application for the removal of the pine trees. I would be happy to provide a more detailed commentary if afforded sufficient time to do so. Based on my preliminary review, however, I am able to provide initial general comments on information gaps and departures from the usual process for consent applications involving impacts on Significant Ecological Areas in Auckland.

My initial impression of the ecological aspects of the consent application is that it appears to be inadequate as the basis for the Hearing Commissioners to make an informed decision. Considering that the application is for vegetation removal in a SEA area, I would expect that an assessment of alternative management options would be submitted to ensure that the Western Springs SEA Forest is managed appropriately from an ecological perspective. In my experience of being involved as an expert ecologist in numerous resource consent applications, providing an assessment of alternatives is an essential requirement of consent applications for vegetation removal in areas with significant ecological values that may be adversely impacted by the proposed activities.

## **Best practice ecological management**

I have considerable experience in developing and implementing ecological management plans designed to transition weed/exotic-dominated vegetation communities (including pine trees/stands/plantations) to native forest. Best/standard practice for SEA areas is for the transition to take place over time as this provides for the maintenance of biological diversity through the process. Examples of adverse ecological effects that can occur if the process is rushed include: the elimination of nest/roost sites for birds and bats due to removal of a large proportion of trees, the loss of native lizard populations when undergrowth and groundcover are reduced substantially, and the loss of soil flora/fauna diversity when leaf litter and soil are exposed to increased light and air movement. On Auckland Council projects (e.g., Project Twin Streams), the standard approach to transitioning vegetation communities dominated by weed/exotic species (including stands of pine trees) to native forest is gradual, holistic, and selective. Such an approach focuses on working with existing conditions rather than against them, which is especially appropriate in significant ecological areas.

As mentioned above, it is important to allow sufficient time for alternative habitat to develop when transitioning stands of pine trees to native vegetation. It may be that some trees are removed immediately (usually only for health and safety reasons), some may be left alive to provide bird and bat habitat, while others may be killed (e.g., by ring-barking or by poisoning with herbicide) but left standing to provide fauna habitat for some time while (and often long after) the trees die. There are many options, and combinations of options, which can be tailored to the site.

The proposal put forward in the consent application for the removal of the Western Springs pine trees includes only one option – specifically, removing all 200+ trees in a single operation. Given the site's confirmed and potential ecological values (e.g., long-tailed bats may be present), the provision of wholesale clearance as the sole option is, in my view, a flawed approach. In my experience it is not an approach that would be supported by council planning and biodiversity officers if it were proposed by a consent applicant external to Auckland Council.

## Conclusion

In my opinion, the applicant for a resource consent application regarding vegetation removal within SEA forest should present alternatives for the Hearing Commissioners as to the various options and methods of how to transition the vegetation community to a functioning indigenous ecosystem. The current proposal, without any provision or consideration of alternatives, does not seem appropriate. It is likely that the site's existing biodiversity would, at best, be adversely impacted. Catastrophic impacts on the site's ecology are a real possibility.

Removing all the 200+ pine trees in one operation is only one option for managing the transition of pine forest to native forest. In my view, the Hearing Commissioners should be provided with alternative options before making a decision on whether to grant consent. Ideally, the alternative options would include an integrated holistic and ecology-focused approach.

I am happy to provide further advice to you and/or the Hearing Commissioners on the likely impacts of the current proposal and appropriate management of the SEA forest.

Yours faithfully,



Simon Chapman  
Principal Ecologist