

| Submission ID | Attachments | Do you have any comments on the Draft Tree Policy? | Name of organisation | Your role within organisation | Speak to Hearings Panel | First name | Last name |
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| 35005 | Yes | The Waipuna/Halswell-Hornby-Riccarton Community Board appreciates the opportunity to make a submission on the Council's Draft Tree Policy for Managing trees in public open spaces. This submission was compiled by the Board's Submission Committee under the delegated authority granted by the Board. Please see submission attachment for full details including: Introduction Planting Maintenance Removal of trees | Waipuna/Halswell-Hornby-Riccarton Community Board | Community Governance Manager | Yes | Matthew | Pratt |
| 34836 | Yes | Please refer to the attached submission from the Waimāero/Fendalton-Waimairi-Harewood Community Board. | Waimāero/Fendalton-Waimairi-Harewood Community Board | Community Governance Manager | Yes | Maryanne | Lomax |
| 34614 | No | Policy 1.2 and 1.3 The Board recommends this policy also applies to new developments on land which will eventually become council-owned or looked after, for example the road reserve plantings in new subdivisions. Policy 1.9 The Board supports the two for one tree replacement policy. Policy 1.10 The Board endorses the Council facilitating community plantings. The Board supports the planting of fruit trees where appropriate. Policy 1.14 We support the retention of commemorative trees. Policy 2.3 and 2.6 Do not appear to address issues raised by residents/ratepayers with the Board relating to trees in Dudley Street (in particular health and safety issues from bird droppings). Policy 2.8 Consider adding risks from roots of trees to pavements and underground services. In addition: The Board recommends that the Council provides clarification on the status of protected trees and whether they fall under this policy or the District Plan. If this status only appears in the District Plan then this needs to be stated in the Tree Policy. The Board supports the Tree Policy. | Waipapa/Papanui -Innes Community Board | Chair | Yes | Emma | Norrish |
| 34960 | Yes | The Waihora/Spreydon-Cashmere Community Board appreciates the opportunity to provide feedback on the Council's Draft Tree Policy. The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this feedback in its capacity as a representative of the communities in the Spreydon-Cashmere area. Please see attachment for full details. Climate Change Accessibility Considerations Policy Introduction Tree Planting Tree Replacement Community Planting Maintenance of Trees in Public Places Tree Risk Removal of Trees Public Requests for Tree Removals Definitions | Spreydon-Cashmere Community Board | Community Board Advisor | No | Karolin | Potter |

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| 34940 | Yes | <p>see attachment written in haste and in summary form.</p> <p>Note i am also on the Tree Policy reference group so no doubt these views will be heard there too.</p> | <p>affiliated with CHCH Biodiversity Partnership, Greening the Red Zone, Opawaho-Heathcote River Network, Travis Wetland, etc</p> | <p>hasn't been time to get sign off to these comments but expect mostly acceptable</p> | Yes | Colin | Meurk |
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| 34922 | No | <p>Tree value is a point that is included in the Draft Tree Policy, and there is also specific mention of the fact that in order for trees to be acknowledged for the value which they provide to the city, there needs to be a valuation system in place.</p> <p>The introduction of the Tree Policy mentions that trees play an integral part in reinforcing our identity as the Garden City, that trees have aesthetic value as well as other social benefits, and that the Council understands the need to take a leadership role in the management of trees to ensure the benefits provided by such a vital resource are maintained for future generations.</p> <p>In light of this it is disappointing and surprising that the Scope of the Tree Policy has failed to prioritise the quality of the environment by not including trees located on private land in the policy, that the biodiversity of those trees is not more greatly valued, and that the stewardship of those trees isn't being exercised through every means available in order to meet the challenge of climate change. This is particularly concerning when in the Residential Central City and Medium Density Zone the urban forest is being lost at an alarming rate due to developers clear felling properties for high density housing, and the general loss of trees on other properties being re-developed.</p> <p>This suggests that the CCC are not living up to several extracts from the CCC's Principles, Community Outcomes and Strategic Priorities outlaid in the CCC's Strategic Framework, namely:</p> <p>The Principle of "Taking an inter-generational approach to sustainable development, prioritising the social, economic and cultural wellbeing of people and communities and the quality of the environment, now and into the future"</p> <p>The Community Outcomes of "Liveable city - 21st century garden city we are proud to live in" and "Healthy environment - Unique landscapes and indigenous biodiversity are valued and stewardship exercised"</p> <p>The Strategic Priority of "Meeting the challenge of climate change through every means available"</p> <p>https://ccc.govt.nz/assets/Documents/The-Council/How-the-Council-works/StrategicFramework/2020-Strategic-Framework.pdf</p> <p>In 2016 Christchurch City Council withdrew protection from 1200 trees on private land. This drew criticism from former City Councillors and two of the Council's own arborists, one of whom stated in a submission to the Council, "There was no reason to reduce the current number of notable trees on private land by 75 per cent. There is no public mandate for this and there was no public consultation. Trees on private property were [already] threatened by potential development".</p> <p>He was unhappy that the new plan removed a rule that enabled subdivision trees to be protected. The rule's removal increased certainty for developers and people wanting to subdivide their sections, but the majority of protected trees in the city were protected either under the rule or as a condition of resource consents.</p> <p>The Council arborist stated that he was worried it will be much easier in the future for subdividers to get rid of trees which should be preserved.</p> <p>https://www.stuff.co.nz/the-press/news/christchurch-earthquake-2011/76383155/tree-protection-change-rankles-christchurch-residents</p> <p>His worries sadly were well founded, and the city has born witness to numerous significant trees being clear felled on properties that were subject to intensive development.</p> <p>Fast forward from 2016 when the list of protected trees on private was slashed by the Council, in May of 2019 the City Council declared a climate emergency.</p> <p>So why are trees on private land not featuring in this Draft Tree Policy? Not only has the list of protected trees been hugely reduced, but removing the protection on them is in stark contrast to the Council's own website which has a page dedicated to the benefits of trees.</p> <p>https://ccc.govt.nz/environment/trees-and-vegetation/benefits-of-trees</p> <p>The page speaks of how development and urban intensification add to the following:</p> <ul style="list-style-type: none"> Transport related greenhouse gas emissions; rises in urban heating; and increased storm water runoff due to increased amounts of hard impermeable surface. <p>There are documented cases where environmentally concerned residents have lobbied the City Council with deputations pleading for large numbers of trees to be saved.</p> <p>58 Perth Street in Richmond is one such case, and a sad example at that where every tree on the property was destroyed, resulting in the absolute destruction of the habitat in which birds and other wildlife lived. This move also completely eradicated the leafy vista the community valued and enjoyed. The lawns and gardens that previously filtered pollutants were also eradicated by the developer. They were replaced with enormous swathes of cement and the very bare minimum of "garden strips" required under the District Plan.</p> <p>Instead of being filtered by the land and into the roots of the trees, pollutants will now flow directly into the stormwater system, resulting in toxic contaminants pouring into our rivers. This is neither ecologically nor environmentally friendly.</p> <p>Does Christchurch City Council want our rivers to be strewn with dead fish and our residential areas of the city to become a concrete jungle, or do you want the city to be a beautiful, healthy urban jungle thriving with life?</p> <p>The difference in the before and after photographs of this one example speak for themselves.</p> | No | cheann | carroll |
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| | | <p>BEFORE / AFTER</p> <p>Under the current District Plan and Tree Policy these confronting images do not paint a pretty picture for in a city that wants to be a 21st century garden city, nor for a city that has declared a Climate Emergency.</p> <p>Developers removing existing trees are replacing them with far fewer trees, and trees that won't reach the same heights at maturity as those they rip out of the ground. As a result of those choices, Christchurch is finding itself with a diminished density of the urban forest.</p> <p>If the Council understands the need to take a leadership role in the management of trees to ensure the benefits provided by such a vital resource for future generations, why are trees on private property not being included in this Tree Policy?</p> <p>The Council are aware of the benefits trees have of cooling hard surfaces in urban areas where temperatures are higher than surrounding rural areas. The Council are also aware that trees restrict unwanted weed growth in waterways, and manage stormwater flows through tree canopies and root systems up taking and processing excess ground moisture.</p> <p>This of course also doesn't take into account how significant trees on private land also contribute to providing shelter and food for a variety of birds and small animals through their flowers, fruits, leaves, buds, and woody parts, nor the fact they provide nesting sites birds and small animals, including native bats.</p> <p>These trees also provide habitats for other plant life, including parasitic plants that live directly off the tree by feeding from it, or epiphytes which use the tree as support. Decomposing leaves, twigs and non-woody roots increase soil fertility and structure for soil borne organisms including bacteria, fungi, protozoa, nematodes, arthropods and earthworms.</p> <p>They also create a protective environment that allows the growth of plants that would otherwise not be there (e.g. shade dwelling or frost tender plants), and contribute to overall plant biodiversity as well as indigenous and endemic biodiversity.</p> <p>By not addressing the significant loss of trees on private land, the City Council is ignoring the large amount of evidence that now demonstrates that exposure to nature in the form of trees, grass, and flowers offers positive interactions that generate extensive physiological, social, and mental wellness benefits that can help alleviate the burden on the health system.</p> <p>The Councils webpage on trees also notes the benefits trees have on mental wellness. It discusses how trees and vegetation have many positive benefits for the community by providing and allowing daily interaction with nature, and goes on to say how trees contribute to the liveability of Christchurch by naturalising, and humanising built environments, through softening hard surfaces and harsh outlines of buildings, complementing building development, and screening unsightly and undesirable views.</p> <p>An Urban Forest should be more than just trees forming a grid pattern following the roadways of the city, and the fringe of parks. A true urban forest should span the entire city, including residential areas of the city where trees are not planted on the roadsides, or as is the case in many of the original city neighbourhoods, trees are not able to be planted due to streets being too narrow to do so.</p> <p>Andrew Rutledge, Head of Parks at CCC has said "work is also under way on a wider Urban Forest Plan, which will provide strategic direction for all Christchurch trees, and will look at scenarios like increasing our tree population, improving biodiversity outcomes and considering the role trees play in addressing climate change."</p> <p>In order to achieve that successfully, shouldn't that work on the Urban Forest Plan be done in conjunction with the Tree Policy? Shouldn't it also be written into the District Plan in order to combat the NPSUD (National Policy Statement on Urban Design) that central Government recently adopted which is seeking more intensification in the residential parts of the city, and will invariably result in the loss of even more trees if measures are not rapidly taken to protect existing trees, including those on private land?</p> | | | | | |
| 34921 | Yes | Please see attached | Forest & Bird | Regional Conservation Manager | Yes | Nicky | Snoyink |

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| 34919 | No | <p>CHRISTCHURCH CITY DRAFT TREE POLICY CONSULTATION CHRISTCHURCH CIVIC TRUST RESPONSE</p> <p>The CCT is aware Council's draft Tree Policy cannot override the Operative District Plan, or the Central City Earthquake Recovery Plan, however it is important, and is an opportunity for signaling improvements and priorities for the future.</p> <p>Overall, the draft policies are sound and non-contentious, and are primarily about tree management.</p> <p>However, they are not visionary, and do not give sufficient voice to important issues and opportunities in relation to trees in our city.</p> <p>We suggest Council Tree Policy needs to recognize:</p> <p>The exceptional history story and heritage value of the city's trees, the positive vision of first settlers to transform treeless barrens with plantings on public reserve lands, and private plantings, which have resulted in much of our city having a significant presence today of notable and historic specimen trees.</p> <p>We suggest strengthening the policy of listing notable/heritage trees, and improving specific provisions for their care and protection as being deserving of much more emphasis.</p> <p>That Christchurch's trees critically are important to our city's character and beauty needs to be acknowledged explicitly.</p> <p>Our city's trees also have a critical function in terms of creating an urban environment that is good for resident's health and well-being. This is especially important for the city's predominantly flat and topographically featureless residential areas, where trees can create landscapes of character and interest, provide privacy, and soften and screen the ugliness of much of the city's built environments. There is a huge literature on the correlation between mental health and well-being with the strong presence of trees in urban environments.</p> <p>The presence and benefits of trees throughout the city are very unevenly spread, and correlate with socio/economic gradients, and attendant negative measures. This is unacceptable, and Council should have a strong policy to correct this imbalance, for the benefit of all, but especially for our city's children in their development years.</p> <p>Christchurch should claim and celebrate the title 'City of Trees'. This is justified on the basis that Christchurch arguably has the greatest diversity of tree species sourced from around the globe, of any city in the world. We should celebrate this diversity as we rightfully now celebrate human and cultural diversity, and we should recognize these positive linkages.</p> <p>In reality sustained effort is required to enhance and expand the areas of the city wherein trees have a significant presence. With higher density urban development, smaller sections and larger house sizes, the opportunities for including large trees in residential Christchurch is increasingly compromised.</p> <p>Stronger council policies promoting more trees, and greater use of large tree species, and the creation of more woodland parkland areas across our city, not just on CCC land and streets, but also encouraged in the context of private residential land areas.</p> <p>Trees are not just for ornamental and amenity purposes, they provide an opportunity to create healthy and diverse ecosystems, richer habitat for insect and bird fauna, create shelter, sequester carbon, improve air quality, whilst ensuring a healthier environment for our people to live and work amongst.</p> <p>We wish to speak to this submission.</p> <p>Thank you, Christchurch Civic Trust Inc.</p> | Christchurch Civic Trust Inc. | Chair | Yes | Chris | Kissling |
| 34917 | Yes | Please see attached file for the submission written for the RRBA from our committee member Greg Partridge | Richmond Residents and Business Association | President | No | Vicki | Brown |
| 34916 | No | Generally speaking the draft tree policy looks very sound. It is encouraging that the CCC will maintain replacement/new trees until they are established or 24 months. However, I wonder if this will in fact happen. As a Reserves Management Committee we put considerable effort, through community involvement, into doing this when we plant natives but I have never seen the Council doing so. Twice in the last year replacement plantings in the Cass Bay Area by CCC have only had some follow up by us. Similarly, some trees which were actually poisoned by someone, were removed by CCC contractors and have not been replaced after nearly 2 years later. We support the tree policy provided that it is enforced and adhered to by the CCC in the Banks Peninsula as well at the central city. | Cass Bay Reserves Management Committee | Chairperson | No | Jenny | Healey |
| 34911 | Yes | <p>Please incorporate pervious concrete or permeable pavement to be used in place of asphalt or conventional concrete around trees. The Melbourne Council has been implementing pervious concrete with great success, and they have found that there is more success with tree health and prevention of damage to adjacent pavements, as impervious surfaces starve roots for water and air. Please find attached a couple of excerpts from the Melbourne Urban Tree Policy.</p> <p>Pervious concrete is also a cool pavement, and reduces the urban heat island effect, and reduces the load of stormwater on municipal drainage systems.</p> | | | No | Simon | Anderton |

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| 34910 | No | Please consider requiring permeable pavement to be used in place of hard stand to at least the tree drip line, or further (as certain species' roots extend further than others). This recreates the natural convective flow of air and water to roots that a forest floor would have, and encourages trees to grow healthier. It also prevents tree roots from destroying footpaths etc., because their roots are not searching for cracks in the pavement that let water in; the roots are properly watered at all times, and grow downward as they do naturally, away from services and city property, which mitigate financial risk to damage. | | | Yes | A M | Hess |
| 34909 | Yes | Please see attached file Banks Peninsula Community Board | Banks Peninsula Community Board | Support Officer | No | Adrianna | Hess |
| 34905 | Yes | Orion NZ Ltd (Orion) lodges the following submission (including Appendices) on the Christchurch City Council Draft Tree Policy (the Policy). The Policy has been prepared to provide guidance for the management and maintenance of trees in public open spaces. Fundamentally, Orion seeks amendments to the Policy to ensure that it provides appropriated recognition of Orion's distribution network within such spaces and support compliance with the Electricity (Hazards from Trees) Regulations 2003 | Orion NZ Ltd | Director of Resource Management Group | Yes | Darryl | Millar |
| 34904 | Yes | Yes. See attached document. | | | No | Annette and Michael | Hamblett |
| 34897 | No | We are very positive about the Tree policy in general. The fact that the council wants to prioritize trees in any new projects put us at the same level that policies set overseas in leading environmental cities. If we want to tackle climate change our way of life require to adapt to nature and not nature adapting to our way of living | | | No | Sawako | Haraguchi |
| 34885 | No | I have a quite a number of things to say about trees and did not realise the deadline for submissions was tomorrow the 12th October. My interest in trees and neighbourhoods goes back OVER 60 YEARS. Merivale Precinct Society Inc was in its heydays of trying to protect our whole area from adverse Councillor Stewart at the time was our main stalwart supporting our ideas. One only has to read our plan of the day to understand where we were coming from and it seems our efforts for various reasons i.e. SO CALLED PROGRESS/ MONEY /COMMERCIAL INTERESTS HAVE PUT PAY TO THIS!! It is certainly not too late to stop the erosion of our area! In Christchurch we have lost many iconic /historic trees What happened to 'Tree protection orders and why hve we allowed the' ROT'to set in ? | | | Yes | JOHN WARWICK | THACKER |
| 34884 | No | My comment is that the company Treotech show a lamentable knowledge of tree pruning. I draw your attention to the way trees in the central median strip of Main North Road have been cut. The trees are now lopsided and look utterly ridiculous. How anyone thinks this is the way to trim a tree, I really do not understand. These people are supposed to be experts! I am a long time gardener, and Treotech's red trucks fill me with dread. The most heinous example is the butchering of the weeping fronds of the beautiful Weeping Willows in Park Terrace. These stunning trees (icons of Christchurch City) have been cut in one side like a fringe and the other side of the tree has been left to grow as it should. The poor trees look terrible and I fail to see how any "arborist " could do this. Just two examples of so many. The other issue I wish to comment on is the planting of trees in planter boxes. Plants need two things to grow and thrive - good soil AND WATER!!! The number of dead and dying plants in planter boxes is an utter disgrace. I wish daily that I had a means to carry water to the sad plants that are now heading into summer, and sure death for many. PLEASE, if you are going to plant trees in boxes, make sure there is a watering schedule. With global warming, and our summers getting hotter, this is an absolute must do. | | | No | Sandra | Shaw |
| 34883 | No | The Canterbury Botanical Society would like to express concern about the use of known pest trees that are currently in situ and whether the removal of potential weedy species and avoiding the planting of 'at risk' species for example: Mayteins (there is a project of the ones in Christchurch on iNaturalist.com), Ornamental Plums, Hawthorn, and Robinia, etc. Of particular concern is the use of weedy species as rootstocks, especially the latter two. The Mayteins and many of the trees mentioned not only set seed easily but also grow from suckers creating a long lasting problem, one place this is visible is at "Robinsons Bush" between Hillmorton Hospital/Seager Park and Curletts Rd. In the draft there is mention of removing 'pest plants' seemingly based on their ability to spread fertile seed through the sprouting in peoples gardens. Will this include native plants? Will a list be created that people can refer to? Are there going to be definitive parameters that will define a 'pest' tree? We would like to suggest having a mix of species along streets as well as both sexes when the trees need both for seed set. This will increase the availability of fruit/food for birds and insects, decrease the allergens for many people and provide variability in the street scape. Another suggestion is to expand the definition of tree to include those that have a range of forms that are not a single trunk with branches at the top. If the council is only willing to look after these plants for two years the people of Christchurch should have the ability to see a range of trees down their streets that includes differences in form, size and age stage differences. | Canterbury Botanical Society | President | Yes | Paula | Greer |

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| 34881 | Yes | <p>Dear policy review panel</p> <p>The 4 columns of tree care, the planting, pruning, removing and protecting are well covered in this document, congratulations. There is a fifth column however, the growing of trees that requires inclusion in this policy and urgent attention. Tree work is generally covered under the Australian and British Standards, but ornamental trees (and shrubs) are produced to no particular standard in New Zealand since none exists.</p> <p>“Tree planting is an integral part of tree management to achieve a long term sustainable canopy over the city”, and CCC will endeavor to plant the most appropriate tree species based on functional attributes, performance, longevity etc. as suggested in this draft policy, however, without a tree growing standard this goal is not achievable to the desired degree.</p> <p>CCC could simply adopt the Australian and or British tree growing standard since the tree nursery industry in New Zealand, to a large degree, cannot be relied on to improve their practices without such guidelines. Council should also consider to either contract grow to specifications and or accept trees from Council approved nursery supplier only. Either way, a quality standard is required and since CCC is in the business of growing trees as well, should be leading by example.</p> <p>Due to the absence of a standard the Garden City (and the rest of New Zealand) have accumulated a massive amount of substandard trees in parks, streets and private properties over a very long period of time. Many of the affected trees die prematurely and or stagnate for several years, (often due to their roots being deformed) before they succumb. This disorder is known as the ‘Underground Epidemic’ (research document attached).</p> <p>The majority of the newly planted trees in the central city and number of subdivisions over the last few years, are hugely compromised, many have already been replaced more than once.</p> <p>Giving that healthy trees are of essential importance to overcome the effects of climate change (as you say, never more important) it is of utmost importance that structurally sound trees with in particular, well-structured root system, are produced.</p> <p>‘True leadership through proactive management’ of trees requires a standard, otherwise the “Rubbish Cycle”, i.e. rubbish in rubbish out continuous, wasting millions of taxpayers dollar annually.</p> <p>To replace the existing trees of poor quality city wide will cost many millions of dollars, and additional funding will be required for the production of quality trees and education.</p> <p>In response to the earth quakes, the people of Christchurch have voted for not only a Garden City, but a ‘City in a Garden’. Billions of dollars have been spend on rebuilding the infrastructure of Christchurch to various internationally accepted construction standards. Now it’s time to establish a standard for one of the most important features of the Garden City and one of the most vital component to overcome climate change....Trees!</p> <p>The Government has developed the ‘One Billion Trees Program’ to increase tree planting across New Zealand. The goal is to double the current planting rate to reach one billion trees planted by 2028. The program has the potential to deliver huge benefits for our environment, people, communities, and our economy. However, these trees need to be grown to a standard in order for this program to succeed.</p> <p>Our world is changing and we need a new game plan CCC’s CEO explained recently. CCC is currently developing the Long Term Plan 2021-31, which sets out what we plan to achieve over the next decade. The CEO is committed to delivering the services and infrastructure our city needs to thrive.</p> <p>Trees are an essential part of our infrastructure and Garden City image. This is a unique opportunity to integrate a Tree Nursery Standard as part of the Tree Policy to restore and sustain the Garden city and the landscapes of ‘Aotearoa’ New Zealand as a whole, in the quest of overcoming climate change.</p> <p>Kind regards</p> | NA | NA | Yes | Dieter | Steinegg |
| 34879 | No | <p>I think particluar importance needs to be given to the planting and protection of Native trees. This would apply to the ability to remove them. I am very concerned about the fire potential in pine and fir forests and eucalipsis forests. These trees burn much more readily than most native trees. I go to burwood forest regularly and am pleased with the increased pick up of the pruning left- overs.However more needs to be done. I think there should be a native buffer between this urban forest (and great asset for christchurch) and surrounding houses. We already know about fires in our dry city. The red zone should be planted only with nz natives.</p> | | | No | Yvonne | Curtis |
| 34876 | No | <p>When planting new trees, plant NZ natives, not exotics. We need to protect and enhance our biodiversity and encourage the return of New Zealand flora and fauna to Christchurch.</p> <p>As above, when replacing existing trees, replant in NZ natives, not exotics.</p> <p>All NZ native trees must be protected. We do not want a repaeat of what has occurred in Canal Road, Auckland.</p> | | | No | Mike | Currie |

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| 34872 | No | <p>Having lived in the inner city area for the last 12 years I have seen a large number of established trees felled. The reasons given are always that the trees are unhealthy. The remaining stumps and branches show otherwise. I'm outraged at the recent felling of around 8 healthy trees from the red zone area around River Rd and Avonside Drive. Now there is no shade, birds have lost valuable nesting places. For a so-called Garden City I feel we are headed in the wrong direction. Since the earthquakes we have had wanton destruction and removal of many prime trees by both council and developers. The Avon Loop area is now bereft of large trees and shade, and shelter, following the development of this area into pathways for pedestrians and cyclists. Any empty section taken over by housing developers is clearfelled. The city has become an ugly monument to concrete with the wall of the Convention Centre, at the end of Gloucester St, being a particular case in point. How about greening this wall with plants to make it a living entity? With the state of the world as it currently is, we need to be listening to the great David Attenborough and all doing our bit, no matter how small, to save the earth. Keeping trees and green areas protected, planting to encourage bees and birds, NOT using Roundup sprays that kill everything they touch and everything around them. Remember, no green, no bees, no food! I feel CCC are quite backward in many of these areas. The sight of a Treetech vehicle puts me on guard for yet more trees being felled - the latest being one of the beautiful Lombardy poplars in the Margaret Mahy playground area. We owe it to the cities children to keep green so that they have a future with breathable, clean, green air and space.</p> | | | No | Fiona | Margetts |
| 34867 | No | <p>Although the policy covers much in a broad sense, 2.11 fails to mention the need to provide habitats for already endangered or declining species which depends on various varieties of trees and plants. For example, some native varieties of bees and birds can only obtain pollen and nectar in the absence of introduced species and some trees can only be pollinated or remain healthy with the existence of specific species of birds, insects and animals. Therefore it is important to provide sufficient food sources in specific areas for types in separate places or trees and plants which can sufficiently provide for most types. Variety is necessary as just as other creatures such as ourselves require variety in order to remain healthy, so do other creatures and insects. Therefore the policy should include planning for diversity and increasing diversity in the urban environment in order maintain a healthy and functional ecosystem.</p> | | | No | Tatsuya Ito | Horrobin |

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| 34866 | No | <p>1. The "Purpose" is presumably the goal, objective, target of the Policy. As such it lacks important direction. The Council has declared a Climate and Ecological Emergency, but there is no reference to this. International scientific research now indicates that 30-50% of all land in temperate climatic regions, such as NZ, should be returned to natural ecosystems to ensure the survival of the human species. There is now an international movement to pursue this objective. The "Purpose" has no regard to this. The "Purpose" should state a target of planting and maintaining at least 30% of Council land in indigenous vegetation as habitat for local ecosystems.</p> <p>2. Policy 1.3 should be amended to state that there will be preference given to local native trees, because these are the ones which belong in NZ and are most compatible with our other native vegetation, our climate, soils, micro-organisms, insects, reptiles, birds, bats etc. The colonial thinking of bringing a bit of everything to NZ has been disastrous for our unique and indigenous flora and fauna and must stop. The protection and care of our indigenous species should be a priority as a matter of national, even international importance. We suggest that the following words be added to Policy 1.3...."with preference to be given to native trees".</p> <p>3. On that subject, the planting of Norfolk Id pines in the coastal corridor from Ferrymead to Sumner is quite inappropriate, and annoying to many people. These trees belong in Norfolk Id. They should be replaced with appropriate local native species such as totara, kahikatea, ngaio etc.(and pohutakawa are not local!). The Commemorative Norfolk Id pines at Sumner Beach are an unfortunate choice, and should not be used as a precedent for elsewhere. People who fancy exotic trees are able to plant them on private land. Public land should be for mainly native trees, they are our heritage and for future generations. An increasing number of New Zealanders are proud of our native heritage and spend much time caring for it.</p> <p>4. Policy 1.4 should not be just limited to existing sites of "ecological significance", but should be providing for many more new sites, to create more areas of ecological significance.</p> <p>5. There should be a further policy to generally provide associations of other native plants with any tree planted. This would give the trees a better chance of survival, make better provision for habitat for native fauna and may even reduce maintenance requirements around the tree drip-line.</p> <p>6. I support the provisions for community involvement in planting and caring.</p> <p>7. With Commemorative trees, Council should give preference to local natives.</p> <p>8. I support the Ecological Improvements Policy.</p> <p>9. There do not appear to be any provisions to deal with unauthorised damage or removal of trees. It should be clear that such actions will not be tolerated and prosecutions will be pursued and restoration costs sought.</p> <p>10. Council should also from time to time, promote the importance of native trees to our ecology and heritage and that they should be cared for and not damaged without Council approval.</p> | Redcliffs Residents Association, Redcliffs Eco Village Group, Drayton Reserve Volunteers | Committee member, Co-ordinator, Co-ordinator | Yes | Dave | Bryce |
| 34857 | No | <p>I think the city should be proud of all its plantings and trees. I love natives in particular but there are also some wonderful exotics that give character to the city. Happy about the extended wetlands Travis Swamp and areas. I think the draft plan is sounding good. Don't forget the smaller plants especially smaller natives as well. I would like to see a Japanese style garden perhaps in NZ natives or both NZ and Japanese style plants. I mean it though, I have been to other parts of the South Island, and the world, and Christchurch and Canterbury have a really good green heritage. Can we have floating houses with trees on the float as well? Can we have more natives on the Port Hills? Don't forget fire breaks, and ways to channel fire to controllable areas.</p> | | | No | Clarisse | Visch |

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| 34855 | No | <p>Re policy 1.1 .</p> <p>Yes please, i strongly support pro-actively seeking opportunities for new tree planting..</p> <p>Re policy 1.5.</p> <p>Could you please ensure this clause does not become an excuse for not planting trees in some of the more challenging but sorely tree-poor residential areas. For example Central City residential and Residential medium density areas will only have a sustainable level of amenity if there is sufficient tree cover. I respectfully suggest tree lined streets are more critical in providing (social, community and health and wellbeing) benefits to public in medium and high density neighbourhoods than in low density suburban neighbourhoods due to limited opportunities for planting in the former, where un-built private land is often too small to support good size trees..</p> | | | No | Ekin | Sakin |
| 34854 | No | <p>Thank you for the opportunity to provide feedback on the Draft Tree Policy. Enable Networks Limited (Enable) value the many benefits that trees bring to Christchurch and our aim is to avoid any damage to the trees.</p> <p>Our feedback is in regards to section 3.0 - working around trees. We query whether there should be a distinction made between damage caused intentionally or accidentally. We do not believe a utility operator should be liable in the circumstances where they have followed an approved TPMP and damage was still caused to the roots, tree or rooting environment.</p> <p>We would also not be liable to the extent that the actions or omissions of the CCC or a third party have contributed to the damage or decline of the tree.</p> <p>Enable would like a clearer understanding of the potential costs that could be payable under section 3.4, for example, how will the 'environmental and ecological benefits provided by the tree' be measured and valued? What sort of amounts may be payable for damage to a tree or its roots and what will the tree valuation method referred to in section 3.5 look like? Currently, it is extremely broad and general and causes concern for an utility provider that may have accidentally caused damage.</p> <p>Thank you for your consideration of our feedback. We look forward to hearing from you.</p> | Enable Networks Limited | Service Support Coordinator | No | Kelly | Belcher |
| 34853 | No | <p>The policy sounds great! Love the protections for existing trees, and the promise to increace canopy cover over the next few years.</p> <p>Is there any way to utilise trees as a means of navigation around the city? E.g. cabbage trees used by local iwi to navigate the swampland, different types of natives for different parts of town, or tall standing natives as landmarks at key intersections or destinations.</p> | | | No | Ben | Laing |
| 34852 | No | <p>Silver birches were a bad choice, you need to take responsibility for the impact these trees have on some peoples health and listen when someone needs one/some removed.</p> <p>The fighting in court some people have had to do while suffering terrible health is disgusting.</p> | | | No | allison | oneill |

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| 34849 | No | <p>CCC Draft Tree Policy Submission</p> <p>I would like to thank the CCC for the opportunity to make a submission to the Draft Tree Policy, 2020.</p> <p>(1) Section 1.0 Tree Planting Policy. (a) I would like to propose the additional following policy statement: 'That tree selection and planting will be done following a ratio of 80% New Zealand native trees to 20% other trees' There are currently 8 policy statements (numbered 1.1 to 1.8) and the policy sections need to be renumbered as appropriate. (b) Policy 1.4 does not adequately address the need to promote the planting of native New Zealand trees as it seems the policy may be limited to sites of ecological significance and there is no real commitment to introducing native New Zealand trees, only to 'endeavour' to do so. I propose to the following change to this policy: 'In sites of ecological significance and throughout all CCC owned and/or managed areas including non urban areas of Banks Peninsula, and the Port Hills, we will set as a priority to strengthen and enhance existing indigenous biodiversity and ecological resilience by selecting New Zealand native species provenanced to the local area or region for new tree planting except where other species are necessary for specified reasons.'</p> <p>(2) Section 2.0 Maintenance of trees in public space,</p> <p>I would like to propose that in section Ecological Improvements, Policy statement 2.12 be modified by adding the words 'by ensuring a ratio of 80% New Zealand native trees to 20% other trees.'</p> <p>Policy 2.12 We will actively encourage opportunities to provide habitat for indigenous flora and fauna 'by ensuring a ratio of 80% native trees to 20% other trees.'</p> <p>Why the emphasis on New Zealand native trees? NZ native trees are unique. We are fortunate to live in a country with a unique ecology developed in global isolation over eons. Our ecology is a treasured biodiverse cultural history shared by New Zealanders with generations of ancestors, and New Zealanders coming from many nations; becoming one nation. We are indeed a special country with a special ecology.</p> <p>Exotic trees are common and may be nice to look at, but they ordinary, they can be found almost anywhere. So, when you see a willow by the river you could think you were in Great Britain, the U.S. or almost any place in the world, but, when you see a kahikatea or kowhai by our rivers you know that you are in New Zealand. This is who we are and it reinforces the link between our past and the path to our shared cultural future.</p> <p>Native trees are a good food source of berries and seeds for our birds. Widespread planting of native trees in our reserves and particularly along our waterways will go a long way to establishing a healthy ecological corridor to support a natural fly route for native birds through our city, and to enhance the natural biodiversity, health, and attractiveness of our rivers as it travels through our communities to the sea.</p> <p>Thank you</p> | | | No | Helene | Mautner |
| 34840 | No | <p>Although encouraged by 2.12 (active encouragement of opportunities to provide habitat for indigenous flora and fauna) I would favour far more emphasis on increasing the proportion of native trees and shrubs throughout the city and not just in sites of ecological significance and non-urban areas (1.4). The native flora contains many beautiful trees and the city should be contributing far more to its conservation in this time of continuing erosion of biodiversity country-wide. A considerably higher density of a diversity of native trees would also provide corridors along which native birds and insects could colonise urban environments.</p> <p>I support the removal of wilding trees (4.7).</p> <p>In the introduction to 1.0, mention is made of "the appropriate canopy cover" but no data is given as to what canopy cover might be at present or to what the future aims might be with regard to increasing cover or to a time-line for reaching that goal. Information of this sort together with an explicit plan for monitoring progress, may be annually, would provide more confidence that this is the chosen direction and that it is achievable.</p> | | | No | Paul | Broady |

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| 34832 | No | <p>Hello,</p> <p>I would like to propose that you have more rules around the land that becomes subdivisions since a lot of this land now becomes cancel land. You say you can't control if sub developers cut trees down but you can. If you said in order for an area to be considered to be a new sub development there had to be at least 2 mature trees (for so many square meters or something) that can be kept on either the road Brum, a small park, or walkways etc. more then 2 would be best of course. but its sad that 2 would be better then what happens at the moment .. for example, i live in Knightstream, and I know there were old oak trees on this farmland, Knightstream has a school with a big field, a rugby field, a park/playground, any one of these locations would have been great to keep a big tree. Plan your area around the trees. The trees should be looked at and should be like oh how can we best use these trees on this land. I don't want to send my child to a school with no trees? I would have to wait 30 plus years before that school has good trees, my child is 1, so that's not going to work. Trees need to be seen as an asset to the land and not a burden that is in the way of the sub developers.</p> <p>If you done this, one the farmers who know they want to sell their land in the future may plant suitable trees, which is also good for the animals on the farm (for shade etc) to often you see animals with no shatter.</p> <p>and second then the developer would make sure they keep some trees rather than coming in and clearing literally everything with no regards to the area. Why this is even allowed to happen is beyond me, everyone knows how important trees are, and you can work around them.. it's just easier not to. but we should look at trees as something that just has to be there so you don't have the option to remove them, therefor you just make it work. The Haswell new divisions, and Wigram which are almost joining now, is one very large area that is become very barren and ugly with the number of trees being cut down every other week! please stop this before its too late, you can not just say we will replant, because that takes 30 pus years before there is anything decent again, so you expect us all to wait 30 years before it looks nice in the area? look after this city and stop letting the developers do as they please.</p> <p>When you do plant trees in these new subdivisions, you need to be coming back to look after them, and actually putting some effort into what trees are planted and not just the bare minimum. the tree care and planting in the halswell wigram area is not good enough, they are not being looked after, they are dying, they are falling over, there is not enough of it being done, down Haswell junction road where the homes from Longhurst back on the main road (as in their back fence is along the roadside) there is literally just woodchips down that row? Why just woodchips? are you going to plant anything?</p> <p>On a hole i think not enough is being done to look after mature trees, or to look after trees once planted. I would like to see some real positive changes put in place. thank you</p> | | | No | Johanna | Quinger |
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| 34827 | No | <p>I support the policy, with only two minor exceptions. In particular, I support 1.1 - 1.8 because of the importance of trees for visual, ecological and environmental reasons. With the mandated infilling / intensification in all High Density areas, we are losing space for trees, as well as for gardens, outdoor family space and water retention..</p> <p>My misgivings relate to 2.5 & 2.6 (removal due to shading in particular). Some of the public spaces (e.g. pocket parks) are over-planted, presumably in case some of the trees / other plants do not thrive. If they DO thrive, thinning may be needed. Shading a residential property that happens to be next to or across from a large tree does need to be addressed..</p> <p>Re replacement of trees in poor condition: 4.1 & 4.2 are too restrictive, especially when the trees in question are there primarily for aesthetic reasons (eg 'tree lined streets'). The policy indicates that even dead trees 'may' be removed, with the only certainty being if they pose a risk. Keeping trees that are past their use-by date, due to age / poor condition defeats the main purpose of having them. A case in point is Gracefield Avenue in the central city (one of the few streets with grass verges & trees). In 2010, the CCC initiated a tree removal & replacement project. They had decided the trees needed to be replaced before they became even more scraggly & unsightly (with several already considered in poor condition. Residents were consulted, and agreement on the replacement species was reached. The project was put on hold because of the EQs, which residents totally understood. However, by 2019, residents felt it was time to kickstart the tree replacement project again. By then, many of the trees were in very poor, poor or fair condition. Some split in a high wind; others lost large branches. Deputations were made to the Community Board and direct communication with CCC arborist, including a suggested approach of removing and replanting the trees in stages, but with commitment that all would be replaced within a 3 year period. The worst trees have been removed, but no definite plan to replacement has been confirmed. The street is only one-block long, and now has several gaps where trees once were, with the majority of the remaining ones in sad condition. Section 4 of the Tree Policy needs to be reconsidered, taking situations such as this into account.</p> | | | Yes | Marjorie | Manthei |
| 34815 | No | <p>The tree policy outlines that it does not cover all areas of trees within the Christchurch City area but it does not make it clear, if when undertaking tree planting programmes, whether there is emphasis on selecting species which will create connecting wildlife corridors to areas of significant biodiversity such as Riccarton Bush, Halswell Quarry Reserve etc... The later perhaps is more relevant with the number of new subdivisions being created around the Quarry. The policy states that the developer will have responsibility for maintaining trees for the first two years of any new sub-division but it does not indicate whether they are made to follow any required planting plans to enhance suitable wildlife corridors. There are a number of native birds in the area bellbird, wax eye and keruru which will have their connecting habitat to areas such as the quarry and port hills reduced and essentially becoming an islands. I would like to see a clear emphasis in the policy as to how it will support and enhance the urban biodiversity plans to protect NZ's unique habitats. The question is, is sufficient land being left in new subdivision areas to allow wildlife corridors, tree clusters etc... as from current plans the majority of areas look to deal largely with drainage management. Street trees alone will not satisfy this requirement. Whilst I appreciate this is more of a parks policy - it is important to ensure policies are supportive of the wider issues.</p> | | | No | Kate | Ody |
| 34750 | No | <p>I support the Draft Tree Policy. I value the lovely trees that we have in Christchurch and am glad to see them being given appropriate priority in this plan, for the right reasons. I particularly support planting native trees and increasing the level of tree cover in general.</p> | | | No | Arthur | McGregor |
| 34729 | No | <p>Make Christchurch a green city with plenty of trees. There are a lot of empty lots in Central Christchurch, why not plant trees to enhance living conditions in the city and get birdlife and other animal life back.</p> | | | No | Marcel | De Wit |
| 34707 | No | <p>There are some specific trees which need to be removed from public places. Silver birch trees are both a health hazard and a pollutant because of the range of fallout which cause ENT problems for many people and blocks spouting and drainage systems. Any property downwind of silver birches on public land is affected at almost all seasons.</p> <p>Sycamore trees planted in berms are an annual problem for many residents as they shed thousands of winged seeds which are blown into properties and germinate like weeds. If left to grow this problem eventually extends further than properties facing on to the street. Claridges Road is a particular example of this.</p> | | | No | Don | Hutton |

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| 34701 | Yes | <p>SET SCENE: Council land between private property the road that has no pathway due to steepness. CONCERN: private land owner uses council land embankment to plant trees, only the trees they plant are so high that it blocks the neighbouring properties views. PROPOSAL: private land owner needs permission to plant on council owned land for personal purposes and the plant selection is determined on a maximum height of growth as to not block views of neighbouring properties.</p> <p>SET SCENE: Council land between Sumner Promenade and The esplanade. CONCERN: private land owners on the Esplanade effected by trees planted blocking their views have been known to poison or vandalise the trees to eventually remove them. PROPOSAL: Plant selection is determined on a maximum height of growth as to not block views of neighbouring properties. This is a win win situation otherwise people are going to constantly vandalise the trees and other locals get angry pointing the finger at the obvious landowners who would benefit from seeing the sea. Depending on what the Coastal pathway want to achieve along this stretch of land, it is worth while consulting with the residents along the Esplanade to see what it is that they would like to look out onto.</p> <p>PROPOSAL: Have a city wide policy that council select 80% of native plants species that provide a food source/nectar for wildlife.</p> <p>1.7 The owners of property located directly next to new or replacement tree planting may have input into the final positioning of the tree, but not as to whether a tree is to be planted outside their property. PROPOSAL: Council will consult with the neighboring private property owner to agree on tree height so as to not block out sunlight or block vista views. To collaborate, communicate for a win win.</p> | | | No | Marnie | Kent |
| 34672 | No | <p>1 where do I find a list of pest trees species? Ginko biloba Stench of rotten fruit Acer campestri have to clean out thousands of of seedlings each year Can they be replace over time, with a less dispersive species. Exotic trees (All other than natives) Can we have trees such as bottle brush included in the bird corridors as they supply food during the winter</p> | | | Yes | Ross | Megget |
| 34583 | No | <p>I support more tree planting wherever possible around the city to help balance carbon emissions but also for shade and the sense of peacefulness and well being that comes along with walking through trees.</p> <p>I believe tree planting should prioritize native trees whenever possible.</p> <p>I also would like to see better maintenance of trees on public land. I live on Armagh street between Barbadoes and Fitzgerald Ave. Many of the trees on the north side of that block have damaged and sick trees which need either pruning or replacement. I also think rubbish removal truck drivers need more education about not damaging trees with their rubbish bin pick up arms (I have seen branches broken from these trucks several times)</p> | | | No | Laura | Gartner |
| 34521 | No | <p>I would encourage the use of indigenous species, not only in ecologically significant areas as outlined in your plan. There is a stigma towards native trees - they are slow growing, not attractive etc which is not true and reflects ongoing colonial attitudes. Respect for indigenous species is important for ecosystems, and relationships with tangata whenua. The use of Totara in Wigram Skies is an excellent example of what can be achieved.</p> <p>Maintenance of trees / shrubs while they are becoming established is a big problem in my area (Wigram). Non-skilled contractors use herbicides and line trimmers to control weeds. Most often this results in dead trees - native trees are particularly susceptible to herbicide use and non-indigenous and indigenous trees alike a susceptible to ring barking. This has resulted in many "gardens" devoid of any plants at all, which is a significant waste of resources and detracts from the local community.</p> | | | No | Michael | O'Grady |
| 34516 | No | I like what I have read. It all seems reasonable. | | | No | Polly | Grainger |

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| 34511 | No | <p>I would like to say that this is as far as I am concerned very comprehensive and easy to read a great overall document. Working at a council myself it would be great to have this adopted here as time and time again green space is the last to get thought of in any project and most of the time it gets ripped out for the sake of saving a few thousand dollars.</p> <p>Mike Warner Selwyn District Council</p> <p>I have also got some comments from a colleague here at SDC too.</p> <p>Hi Michael I have reviewed the draft CCC Tree Policy and note that overall it is a very comprehensive and well-pitched policy document that will integrate nicely with the likes of an Urban Forestry strategy (once developed). Looking at it from a fresh perspective, I can see how Policy 1.2 in particular, may be difficult for other sectors to accept. That; "All projects we lead will prioritize the incorporation of new tree planting into their design. This may include but is not limited to installing new underground services outside of grass berms to allow sufficient rooting environment for new trees". As a Landscape Architect, the opposite of this is something that I have just come to accept – infrastructure takes precedence over the natural. To flip this around and suggest that it takes priority is bold, but perhaps it is exactly the kind of 'new-age' thinking that is required in today's world of environmental degradation and climate crises. Policy 3.1 – "A Tree Protection Management Plan (TPMP) is to be submitted to us for any activity or work proposed near one of our trees where the works are likely to impact on the tree or its root zone". I think this is good practice and would support this approach. As above, there is a need to elevate and give better recognition to the value and importance of our tree stocks. A process such as this will help to ensure better protections etc. are put in place.</p> <p>Kind regards Derek</p> | Selwyn District Council | Reserves Officer (Arborist) | No | Michael | Warner |
| 34504 | No | <p>The overall plan is well thought out and appropriate to a city such as Christchurch.</p> <p>The only thing I would add is the suggestion to mix species planting in streets, as done in Chester St East where the different species have a range of flowering times and the different forms of leaves and the trees themselves adds to the street-scape. This would include a range of flowering times (to reduce hayfever), deciduous and non-deciduous species. The different species would also remind people that there is a range of tree forms. The fauna of Christchurch and Canterbury would use them at different times increasing the diversity visible to more people.</p> | | | Yes | Paula | Greer |
| 34502 | No | <p>I really hope there will be more policy's made about preserving the old heritage trees that are so special and uncommon in NZ. And to plant more heritage trees to keep the spirit of the founders/ancestors that came here, as well as to keep the look and feel of areas with the really special old English/French etc trees planted there. Some take 100 years to grow and can't be replaced in a day, unlike the lower maintenance trees being planted, and they only take a day to chop down.</p> | | | No | Alice | Roberts |

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| 34488 | Yes | <p>Tree value is a point that is included in the Draft Tree Policy, and there is also specific mention of the fact that in order for trees to be acknowledged for the value which they provide to the city, there needs to be a valuation system in place.</p> <p>The introduction of the Tree Policy mentions that trees play an integral part in reinforcing our identity as the Garden City, that trees have aesthetic value as well as other social benefits, and that the Council understands the need to take a leadership role in the management of trees to ensure the benefits provided by such a vital resource are maintained for future generations.</p> <p>In light of this it is disappointing and surprising that the Scope of the Tree Policy has failed to prioritise the quality of the environment by not including trees located on private land in the policy, that the biodiversity of those trees is not more greatly valued, and that the stewardship of those trees isn't being exercised through every means available in order to meet the challenge of climate change. This is particularly concerning when in the Residential Central City and Medium Density Zone the urban forest is being lost at an alarming rate due to developers clear felling properties for high density housing, and the general loss of trees on other properties being re-developed.</p> <p>This suggests that the CCC are not living up to several extracts from the CCC's Principles, Community Outcomes and Strategic Priorities outlaid in the CCC's Strategic Framework, namely:</p> <ul style="list-style-type: none"> • The Principle of "Taking an inter-generational approach to sustainable development, prioritising the social, economic and cultural wellbeing of people and communities and the quality of the environment, now and into the future" • The Community Outcomes of "Liveable city - 21st century garden city we are proud to live in" and "Healthy environment - Unique landscapes and indigenous biodiversity are valued and stewardship exercised" • The Strategic Priority of "Meeting the challenge of climate change through every means available" <p>https://ccc.govt.nz/assets/Documents/The-Council/How-the-Council-works/StrategicFramework/2020-Strategic-Framework.pdf</p> <p>In 2016 Christchurch City Council withdrew protection from 1200 trees on private land. This drew criticism from former City Councilors and two of the Council's own arborists, one of whom stated in a submission to the Council, "There was no reason to reduce the current number of notable trees on private land by 75 per cent. There is no public mandate for this and there was no public consultation. Trees on private property were [already] threatened by potential development".</p> <p>He was unhappy that the new plan removed a rule that enabled subdivision trees to be protected. The rule's removal increased certainty for developers and people wanting to subdivide their sections, but the majority of protected trees in the city were protected either under the rule or as a condition of resource consents.</p> <p>The Council arborist stated that he was worried it will be much easier in the future for subdividers to get rid of trees which should be preserved.</p> <p>https://www.stuff.co.nz/the-press/news/christchurch-earthquake-2011/76383155/tree-protection-change-rankles-christchurch-residents His worries sadly were well founded, and the city has born witness to numerous significant trees being clear felled on properties that were subject to intensive development.</p> <p>Fast forward from 2016 when the list of protected trees on private was slashed by the Council, in May of 2019 the City Council declared a climate emergency.</p> <p>So why are trees on private land not featuring in this Draft Tree Policy? Not only has the list of protected trees been hugely reduced, but removing the protection on them is in stark contrast to the Council's own website which has a page dedicated to the benefits of trees.</p> <p>https://ccc.govt.nz/environment/trees-and-vegetation/benefits-of-trees The page speaks of how development and urban intensification add to the following:</p> <ul style="list-style-type: none"> • Transport related greenhouse gas emissions; • rises in urban heating; • and increased storm water runoff due to increased amounts of hard impermeable surface. <p>There are documented cases where environmentally concerned residents have lobbied the City Council with deputations pleading for large numbers of trees to be saved.</p> | RRBA - Richmond Residents and Business Association | Committee Member | Yes | Greg | Partridge |
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58 Perth Street in Richmond is one such case, and a sad example at that where every tree on the property was destroyed, resulting in the absolute destruction of the habitat in which birds and other wildlife lived. This move also completely eradicated the leafy vista the community valued and enjoyed. The lawns and gardens that previously filtered pollutants were also eradicated by the developer. They were replaced with enormous swathes of cement and the very bare minimum of "garden strips" required under the District Plan.

Instead of being filtered by the land and into the roots of the trees, pollutants will now flow directly into the stormwater system, resulting in toxic contaminants pouring into our rivers. This is neither ecologically nor environmentally friendly.

Does Christchurch City Council want our rivers to be strewn with dead fish and our residential areas of the city to become a concrete jungle, or do you want the city to be a beautiful, healthy urban jungle thriving with life?

The difference in the before and after photographs of this one example speak for themselves.

Under the current District Plan and Tree Policy these confronting images do not paint a pretty picture for in a city that wants to be a 21st century garden city, nor for a city that has declared a Climate Emergency.

Developers removing existing trees are replacing them with far fewer trees, and trees that won't reach the same heights at maturity as those they rip out of the ground. As a result of those choices, Christchurch is finding itself with a diminished density of the urban forest.

If the Council understands the need to take a leadership role in the management of trees to ensure the benefits provided by such a vital resource for future generations, why are trees on private property not being included in this Tree Policy?

The Council are aware of the benefits trees have of cooling hard surfaces in urban areas where temperatures are higher than surrounding rural areas. The Council are also aware that trees restrict unwanted weed growth in waterways, and manage stormwater flows through tree canopies and root systems up taking and processing excess ground moisture.

This of course also doesn't take into account how significant trees on private land also contribute to providing shelter and food for a variety of birds and small animals through their flowers, fruits, leaves, buds, and woody parts, nor the fact they provide nesting sites birds and small animals, including native bats.

These trees also provide habitats for other plant life, including parasitic plants that live directly off the tree by feeding from it, or epiphytes which use the tree as support. Decomposing leaves, twigs and non-woody roots increase soil fertility and structure for soil borne organisms including bacteria, fungi, protozoa, nematodes, arthropods and earthworms.

They also create a protective environment that allows the growth of plants that would otherwise not be there (e.g. shade dwelling or frost tender plants), and contribute to overall plant biodiversity as well as indigenous and endemic biodiversity.

By not addressing the significant loss of trees on private land, the City Council is ignoring the large amount of evidence that now demonstrates that exposure to nature in the form of trees, grass, and flowers offers positive interactions that generate extensive physiological, social, and mental wellness benefits that can help alleviate the burden on the health system.

The Councils webpage on trees also notes the benefits trees have on mental wellness. It discusses how trees and vegetation have many positive benefits for the community by providing and allowing daily interaction with nature, and goes on to say how trees contribute to the liveability of Christchurch by naturalising, and humanising built environments, through softening hard surfaces and harsh outlines of buildings, complementing building development, and screening unsightly and undesirable views.

An Urban Forest should be more than just trees forming a grid pattern following the roadways of the city, and the fringe of parks. A true urban forest should span the entire city, including residential areas of the city where trees are not planted on the roadsides, or as is the case in many of the original city neighbourhoods, trees are not able to be planted due to streets being too narrow to do so.

Andrew Rutledge, Head of Parks at CCC has said "work is also under way on a wider Urban Forest Plan, which will provide strategic direction for all Christchurch trees, and will look at scenarios like increasing our tree population, improving biodiversity outcomes and considering the role trees play in addressing climate change."

In order to achieve that successfully, shouldn't that work on the Urban Forest Plan be done in conjunction with the Tree Policy? Shouldn't it also be written into the District Plan in order to combat the NPSUD (National Policy Statement on Urban Design) that central Government recently adopted which is seeking more intensification in the residential parts of the city, and will invariably result in the loss of even more trees if measures are not rapidly taken to protect existing trees, including those on private land?

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| 34484 | No | <p>i support keeping CHC as green as possible and ensuer if we suupport more intensive land use in the city we do not do this an the expense of having lots of trees</p> <p>i do not believe people appreciate the cooling benefit of trees on their environment in the hotter summer months - a deciduous tree allows for sun and warmth in the winter months</p> <p>there needs to be a balance between planting exotics and natives.... not all natives please</p> | | | No | Jane | Newton |
| 34461 | No | <p>I enjoy have tree lined streets however I think more thought needs to be given about the suitability regarding height. The street I live in is lined with oak trees which I have the tallest. I can live with it blocking out the sun, and at the moment I am managing to clean up bags and bags of leaves, however being retired I will not be able to do that forever. The tree outside my property has shallow roots some 12 inches in diameter, as seen recently when they dug trenches for the switchboards on properties. The footpath, the driveway entrance and my driveway are all cracked. The footpath is leading to a safety hazard with a number of bumps. I have to replace my drive because of the cracks and sunken slabs at a considerable cost. I now know that if my wase drain pipe gets blocked again, I am to call CCC for your cotractors to clear the peipes at no cost to me. The drain layer I had in advised me the roots of the tree was the cause of the blockage I had. So a long story please think about the type of trees you plant. A google search shows</p> <p>Which Tree Types Have Non-Invasive Roots? Japanese Maple, Crape Myrtle, Eastern Redbud, Cornus Mas, Serviceberry, Kousa Dogwood, Japanese, Tree Lilac, Dwarf Korean Lilac.</p> | | | No | Wendy | Rockhouse |
| 34457 | No | <p>More protection needs to be put in place around mature trees. We don't want to loss our mature trees for pointless reasons I ns eg leafs in my gutter</p> | | | No | Brendan | Evans |
| 34455 | No | <p>Looks pretty good to me. I moved from Auckland 3 years ago. Auckland has lost a lot of trees without consideration for their value. Although many were on private land they would once have been protected. One of the reasons I love living here is the trees, and the fact that Council recognises their value. I realise it costs money to have trees and people safely living together, but that money is well spent for the many benefits we enjoy as a result. Economics often ignores benefits which are not given a cost or value so I think it is a good idea to work out and state values for trees.</p> | | | No | Angela | Hart |
| 34453 | No | <p>When planting or re-planting trees strong preference should be given to trees native to Aotearoa. There is no need for Otautahi to resemble some foreign country or other.</p> <p>The only exceptions should be for food forests, mainly trees producing edible nuts and fruit.</p> | | | No | John | Livesey |
| 34449 | No | <p>Christchurch is the garden city and one of the most beautiful parts of this are the gardens and Hagley Park, as well as the beautiful cherry blossom trees, daffodils, oaks in these areas. Protect them at all costs.</p> <p>Please don't keep planting only natives. Sure in some areas but please don't do a complete overkill. We have a combined cultural heritage and the exotic trees planted as far back as the 1850s are very meaningful to many thousands of Cantabrians.</p> <p>Please desist from trying to "be modern" and to "be interesting" with these expensive sculptures (like paying thousands for stairs that go nowhere in the river and then huge amounts on maintenance costs; like that repulsive mess opposite the Mahey playground, when beautiful trees that live in the concrete jungle and give us life and love, are a far better (and cheaper) option. Please don't try to reinvent the wheel. Do what works. Trees work. Plant them. Enough of all of the murals on walls. More trees please. They breathe, they provide us with oxygen, they soak up carbon dioxide, they provide us with shade and shelter and love. More trees, less "arty grafitti". Many thanks. Mary Hobbs. Writer.</p> | | | Yes | E M | HOBBS |
| 34446 | No | <p>I consider the draft needs to include trees (silver birch) that have been planted on berms within 3 metres of each other and are now mature and are very close to a dwelling, that either one or both trees be removed with a suitable replacement. As climate change progresses with increasing extreme weather condition these shallow rooted trees pose a danger to the house occupants and passerby. Who is responsible for this? We have taken this to a community board and they considered we would need to pay for the tree removal and replacement. We considered this unjust as it was the Council who planted the trees, especially the tree removal and the danger these trees pose does not appear to be a factor taken into consideration. Also footpath safety with footpath damage cause by the tree roots is an ongoing process and the damage to the drains from the street to our property also is not considered.</p> <p>Otherwise trees are an important asset to the city landscape and health. Consideration given to the trees that will manage climate change extreme conditions should be at the fore front of the decision making process. Thank you.</p> | | | No | Kaye | Leckie |
| 34440 | No | <p>Talltree Avenue, Avonhead, where we live, used to be tree lined and beautiful. Trees have been removed and not replaced. We would love for the Avenue to be tree lined again, in keeping with the Draft Plan. We wholly support the plan.</p> | | | Yes | Louise | Callaghan |

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| 34433 | No | <p>I was disappointed by the limited reference to native planting, with 1.4 stating that native trees are only preferred "In sites of ecological significance". I do appreciate the work the council and other bodies are doing regarding native plantings and it's great to see new areas of native bush forming, but we are a long way from bringing back native birds in any number. Species which are common in other cities (Tui, Kereru, Bellbird) are pushed to the fringes of Christchurch if they exist at all.</p> <p>It would be fantastic to see a policy along the lines of 'Native plantings are to be preferred unless there is a strong reason to plant exotics, with a priority to increase native biodiversity and support a healthy native bird population'.</p> | | | No | David | Little |
| 34431 | No | Yes, We do would like to comment and know more | Dharma Yodha NZ | CHAIRMAN | Yes | Naga Bhushan | Mamidipally |
| 34427 | No | The draft tree policy is a good start at leading the conversation on climate change adaptation and ecological conservation. Christchurch claims to be a garden city and by having more trees planted this will continue to contribute to this image. Planting trees is also proven to be have a positive effect on peoples physical and mental health which is something that needs to be implemented in Christchurch. I really like the commemorative aspect of this policy. Christchurch has faced a lot of grief and damage over the past 10 years and this will be an amazing way for our community to remember those we have lost and see them grow. This allows the community to be involved and I feel they will be appreciative to have the opportunity. | | | No | Sophie | Canute |
| 34425 | No | Plant natives first, food trees for people and animals, insects next. Trees that aren't in these categories should only be a last resort | | | No | Annette | McIntyre |
| 34424 | No | I feel there need to be action plans for tree lined streets, in our area one street the trees are all too large and damaging the road and footpath. I think there should be a planting plan where one side is ripped out but with a guarantee it will be replanted then say 5yrs later once those trees have established rip out and replace the other side. I do not believe the owner should have any say unless obvious reasons such as maintenance or health issues etc because the current owner could sell tomorrow. I also believe there need to be guidelines for companies such as enable and connectics as to where their cables are run and they should avoid running cables in the grass berm in an Ave (tree lined street) and should run in the footpath or road edge. I also think in areas where there are a lot of deciduous trees the street cleaning should be increased during autumn. Also where a replacement berm tree request is denied I feel the requestor should be replied to with a sufficient and factual response. I am happy to be contacted regarding my submission. | | | Yes | Sophie | Robb |
| 34417 | No | <p>It should be policy for trees on the port hills to be planted to allow for future separated walking and mountain biking tracks to cross the area of planting. The lack of planning and assumption that no track will be built in the future has cost many volunteers a lot of time.</p> <p>Where no allowance was made for future tracks, the removal of a minimal amount of trees to allow for track building works should be delegated to the head ranger. This will ensure the recreation values of the port hills are realized, even if planting was deliberately positioned to stop recreational use of public land.</p> <p>The tree policy should encourage the use of fire breaks (whether unplanted areas or taking advantage of the University Of Canterbury's very detailed research on flammability of local native species).</p> <p>A lot of information on flammability is now known and it would be sensible to ensure that an assessment of flammability and fire separation (e.g fire breaks or strips of less flammable planting to separate areas of tree planting) is required whenever planting is planned.</p> | | | No | Mark | Penrice |
| 34413 | No | <p>I would like native trees to have priority. For any planting, native tree species should always be considered first. They may take a bit longer to grow in some cases, but they will help reduce the amount of fragmentation in the city, and establish green corridors and food sources for native fauna. It will also help establish seed sources for self seeding natives. Having more native biodiversity in our urban environments would be amazing!</p> <p>https://newzealandecology.org/system/files/articles/NZJcol33_1_60.pdf</p> | | | No | Debbie | Lewis |
| 34410 | No | In wellington resedents have been able to plant the street vergue in front of their house with plants paid for by council ccc should be doing this in conjunction with places like trees for Canterbury that donate trees for council reseasves etc | | | No | Richard | Rowe |
| 34409 | No | <p>I would like to see the inclusion of planning trees within the Red Zones land currently owned by the Council. Over time this will enhance the land and keep the ground in a more stable condition. Currently I see a large number of plots with tree/hedge borders that remind all that pass that these are lost homes. Would be nice to see more tree planting in these areas, to start to fill in the gaps.</p> <p>Schools could get involved in the planting, or companies 'sponsor' an fixed area for the cost of some trees, those convicted of crimes having to do community service could also be used to plant up the area.</p> <p>So many mature trees are being lost in the developments of the suburbs , Prestons' being a classic example. We need to replace at a rates of at least 5 to 1 just to make a dent.</p> | | | No | Colin | Tucker |

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|-------|----|--|--|----|--------|--------|
| 34406 | No | <p>I support the renewed focus on tree protection and enhancement. This policy does not go far enough - ideally this policy would have stronger protection for existing trees, better emphasis on cultural values and clearer minimum requirements for new planting.</p> <p>I am concerned that there is no evidence base for this policy included on the 'have your say' page. There is no metrics provided on existing tree canopy cover, no case studies or analysis of what has been working and what needs further assistance. In contrast Auckland Council reports on its total tree cover (using Lidar data measured every 3 years and broken down to a local board area). This is the type of data necessary for an evidence based approach to inform this policy.</p> <p>I note that there is reference to an urban forest policy, which is to be read in conjunction with this policy. Given this policy is not yet public it is impossible to know how they will compliment or overlap and unacceptably requires blind faith.</p> <p>I am concerned there is no mention of Mana Whenua or the cultural significance of trees. It appears that western notions have been provided for with the policies on commemorative trees but no similar policy for non-western notions of value.</p> <p>I am concerned that there are not sufficient mechanisms to ensure the policies are met and adhered to. For example, policy 1.1. 'We will actively seek new tree planting opportunities in suitable locations to maximise canopy cover and deliver ongoing environmental, economic and social benefits.'</p> <p>This would allow for staff to seek, and not find.</p> <p>I suggest that this should include some base minimums such as:</p> <ul style="list-style-type: none"> - For council project areas, a minimum 20 percentage of the site to be covered in tree canopy - For council car parks, a minimum of 1 tree per 5 car parking spaces spread throughout the car park (note this is similar to district plan minimums for private car parks). - For streets, lanes and roads, a minimum of 1 tree every 15m linear length; a minimum of 1 tree for every 3 on-street car parks. - For Parks and reserves, a minimum of 40 percentage of the site to be covered in tree canopy <p>This should be applied to both new projects/streets/car parks/reserves as well as refurbishment/renewals.</p> <p>Policy 1.2 starts with 'All projects we lead will ...' I am concerned that this will be read as projects led by the parks team. This should just read 'all projects' to ensure that any project led by any part of council is held to the policy.</p> <p>I am concerned that policy 1.5 allows for too many 'get out of jail free cards'</p> <p>'Trees will be planted only in the road reserve where the species selected has sufficient space to grow into mature and healthy specimens without causing significant damage to existing infrastructure. Trees will be planted under power lines only where the species selected is able to grow to maturity without requiring line clearance pruning that results in poor tree form or structure.'</p> <p>I would suggest that the policy is rewritten to say:</p> <p>Trees will be planted in the road reserve; planting no trees is not an option. Species will be selected that are appropriate for the location to prevent significant damage to existing infrastructure. Trees will be planted under power lines only where the species selected is able to grow to maturity without requiring line clearance pruning that results in poor tree form or structure. In situations where there is no suitable species than removal and or relocation of infrastructure is required.</p> <p>I would encourage an additional policy which states that potted tree does not count as a tree for the purpose of this document. This would prevent such situations as the current Victoria Street road renewal where trees in pots are masqueraded as street trees. Potted trees cannot grow to significant size, limit the ability for nutrient circulation of the soil and do not assist with water filtration/run off mitigation.</p> <p>Policy 1.8 'The cost of planting and establishing street and park trees within new subdivisions will be covered by the developer for at least 24 months.' This needs to include a reporting mechanism or similar that ensure proper care is provided. I have witnessed many developers plant trees and fail to carry out necessary works to keep it alive. Suggest that an alternative system is provided where developers can pay council</p> | | No | Andrew | Barber |
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| | | <p>staff to do the maintenance work or lodge a bond which is only released once tree is established (5 years).</p> <p>Suggest that an additional policy is added that ensures suitable soil conditions and drainage is provided to give each tree best chance of thriving.</p> <p>Under ecological improvements suggest that additional weight is given to indigenous tree species. Indigenous trees should be the presumptive choice rather than exotic. Going forward exotic trees should only be used to complete an existing corridor or for extra special reasons. Note that some indigenous trees prefer cluster planting rather than specimen planting and this should be accommodated.</p> | | | | | |
| 34400 | No | <p>Policy 1 Planting - do the site requirements include consideration of future root growth based on planting proximity to the sealed path and water availability? Also a seasonal consideration on blocking light from drying the path in winter?</p> <p>Policy 2.1</p> <p>We will maintain tree canopy clearances of our trees over footpaths, cycle ways, carriageways, vehicle crossings and onstreet car parks where it is practical to do so. Where this is likely to cause long or short term detriment to the tree we will prune the tree only to the extent required for the interest of public safety.</p> <p>Does this policy ensure that trees will be monitored from when they are planted to full canopy height above the footpath to ensure that at no stage they have branches projecting into the path below 2 metres?</p> | | | No | Carina | Duke |
| 34399 | No | <p>The council recently felled trees in Lionel street, Avonside which has substantially affected the streetscape. Prior to felling the trees the street had a suite of mature trees which enhanced the heritage value, aesthetic value and community setting of the street. This council stated it would replant, this was two years ago and no action has been followed up with.</p> <p>My first concern with the proposed Tree Policy is that there is no mention of consultation with the affected community about the removal of trees.</p> <p>My second concern, is that there is nothing about protection of heritage trees in the proposed Tree Policy.</p> <p>Otherwise I commend the policy on its proposal to plant two trees for every tree removed, how is that made transparent to the community though?</p> | | | No | Jeremy | Habberfield-Short |
| 34398 | No | <p>Does this policy include a tree canopy target suburb by suburb and the city as a whole. If not i would like to see one. Most cities around the world have now adopted one why shouldn't we. I would like to see clear targets and methods to make it happen otherwise its just more words and reporting for the sake of it.</p> <p>1.2 states a somewhat vague commitment to planting additional trees. Why not have an \$x towards tree planting or a number of trees target. I also urge council to introduce minimum requirements for street trees to be planted with any new developments. There shouldnt be a single development allowed without paying for or planting at least a few trees in the street.</p> | | | No | Abdallah | Richards |
| 34397 | No | <p>While I acknowledge clauses 1.3 and 1.4 of the policy and the need for native planting in ecologically sensitive areas. I strongly am in favour of the retention of a broad range of exotic species such as Oaks, Elms, Walnuts and Plane trees in public spaces not only Hagley park. The true glory of the cities trees can be seen in Autumn with the magnificent change of colours we are lucky to experience. Both native and exotic trees have a significant role to play in our city's future.</p> | | | No | Gordon | Bartram |

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|--------------------------|-----|---|------------|----------|-----|-----------|------------|
| 34396 | No | <p>This policy is focused on a series of operational tactics, without a clear purpose or 'why' that explains why these particular tactics are needed now. I focus on this because it is clear from the challenges described in the opening paras that it is vital we shift our relationship to trees, but the tactics appear to just be a clarification of what CCC does now.</p> <p>This approach reduces the impact of the policy, which is a crucial opportunity to shift CCC / local people's relationship to trees and so catalyse actions that make us more sustainable as a place: environmentally, socially and culturally</p> <p>For instance - in the opening para you acknowledge that we have a social and cultural relationship to trees, and place that in the context of climate challenges. But without a clear sense of the shift we need it is uncertain why the tactics you have suggested are memorialising and community planting. There is so much more to our relationship to trees than these two actions - which incidentally empower only a small number of people of a certain type to contribute and steward our sustainability - leaving the rest behind.</p> <p>What other tactics have you considered and dismissed - why do these not work in Christchurch? Or is it that you understand that doing more of the same is enough - if so this case needs making. Or is there a missing phase where you have the opportunity to research how other cities are approaching this?</p> <p>All over the world local authorities are co-designing big 'whys' for their trees, and also for their wider urban forests. These are leading to new modern tactics for today's challenges - beyond the (valuable but limited) tactics discussed through this policy. By leaving the 'why' to an urban forestry strategy which doesn't yet exist this policy will either be an impediment or a distraction that limits the Urban Forestry Strategy's as yet undesigned purpose.</p> | Consentire | Director | Yes | Anne | Cunningham |
| 35636 Late submission | Yes | <p>I apologise for this very late submission. My greatest concerns relate to the Draft Tree Policy's statement 2.0 maintenance of trees in public spaces - note; on Monday 2/11/20 I read out my prepared statement (see Attachment) about the unsatisfactory consultation process for The Draft Tree Policy, at the public forum of the Linwood-Central-Heathcote Community Board Meeting, After I'd spoken I understood from Cr Yani Johanson that I could put in a late submission and then provide details to the Hearing Panel on (7 December?). If my detailed submission has to be provided before the hearing panel meeting, please let me know. As I'm not online, have no cellphone or answerphone, would you leave information for me at Linwood Service Centre. Staff there know me (and have been so helpful) and I visit the Library/Service Centre almost daily. Otherwise try phoning my landline before 10am.</p> | | | Yes | Elizabeth | Graham |

SUBMISSION TO: Christchurch City Council

ON: Draft Tree Policy for Managing trees in public open spaces

BY: Waipuna/Halswell-Hornby-Riccarton Community Board

CONTACT: Matthew Pratt
Community Governance Manager
matthew.pratt@ccc.govt.nz
[REDACTED]

1. INTRODUCTION

The Waipuna/Halswell-Hornby-Riccarton Community Board ("the Board") appreciates the opportunity to make a submission on the Council's Draft Tree Policy for Managing trees in public open spaces ("The Policy").

This submission was compiled by the Board's Submission Committee under the delegated authority granted by the Board.

The Board **wishes to be heard** in support of its submission.

2. SUBMISSION

2.1 Introduction

The Board recognises the importance of trees to the city of Christchurch and the aesthetic, environmental, economic and social benefits that they provide. The Board is, therefore, pleased that policy guidance is being provided for the planting protection, maintenance and removal of trees on land owned and looked after by the Council and is overall supportive of the direction of the policy. In respect of the detailed provisions of the Policy Board makes the following comments:

2.2 COMMENTS

Planting

2.2.1 Planting of new trees

The Board supports policies 1.1 and 1.2 directing the seeking of opportunities to plant new trees and the prioritisation of the incorporation of new tree planting into the design of all Council led projects.

2.2.2. Tree species

The Board notes that Policy 1.3 is for the Council to endeavour to plant the most appropriate tree species. The Board agrees with this but would like to see an addition to the policy indicating that there will be a preference for planting native species where it is appropriate to do so.

The Board supports Policy 1.4 that provides that in sites of ecological significance the Council will try to plant native species with provenance to the local area or Region.

2.2.3 Tree replacement

The Board acknowledges the aim of Policy 1.9 to see every tree removed replaced with at least two others and for the replacement trees to be planted in proximity to where the tree has been removed. It considers, however, that there are cases where it would be more appropriate for trees removed from the road corridor to be replaced by trees planted in a nearby reserve. This could apply for instance where trees are removed or the installation of a cycle way.

The Board supports policy 1.10 to encourage and support community planting and agrees that that this a good way forward to invest the community in the trees on public land.

2.2.4 Commemorative Trees

Policy 1.1 indicates that requests for planting commemorative trees in open spaces will be considered but does not specify by who. The Board suggests that these applications should come to community boards for consideration with the advice of an arborist.

Policies 1.13 and 1.14 provide for determination of minimum replacement periods for commemorative trees and for replacement of trees removed within this period. The Board considers that this is not appropriate and rather takes the view whenever a commemorative tree is removed and particularly where the removal is for a development or a Council project that there should be replacement in the proximity.

Maintenance

2.2.5 Tree Maintenance

Policy 2.5 states there will be no full height reduction pruning to alleviate tree issues such as shading or debris, or the establishment, retention or enhancement of views. While the Board understands the aim of this policy it considers that it is too rigid and asks that it be made more flexible by the addition of the words "As far as practicable" at the start of the sentence. This will allow for exceptional circumstances where the extent of the problem warrants full height reduction pruning.

The Board acknowledges the policy 2.7 that provides for tree pruning to be at the cost of property owner(s) (presumably adjacent) where they are sole recipients of the benefits of pruning but considers that it needs to be made clear that this will not be an automatic requirement otherwise there could be a situation where those who can afford it will have a remedy while those who cannot afford will not.

Removal of Trees

2.2.6 Wilding Trees

The Board supports policy 4.7 providing for removal of wilding trees that are considered to be a threat as a pest species or cause a nuisance in a particular location but would like to see it extended to provide for removal of wilding trees that have the *potential* to cause a nuisance in a particular location as this recognises that it is often easier and less expensive to remove a tree at an earlier stage rather than waiting until actual nuisance occurs.

2.2.7 Cycleways

The removal of trees necessary for the installation of cycleways is a particular situation that gives rise to a number of matters that the Board considers need to be specifically addressed in the policy.

2.2.8 Removal for Health Reasons

The Board understands the complexities of dealing with requests for removal

of trees for health reasons but considers that the requirement of policy 4.16 for the trees to be the **sole** of a health condition before removal of a tree will be considered is harsh. The Board would prefer to see the words dominant or significant used in this policy. The Board further considers that it should be made clear that a consideration to be taken into account will be whether an applicant moved to the property knowing the presence of the trees and their likely effect on health.

2.2.9 Cost of Removal

The Board notes the opportunity created in policy 4.20 to recover the costs of tree removal from an applicant but considers that this could only apply where the likely costs are to be able to be determined by an applicant going into the process.

Definitions

2.10 Qualified arborist

The Board notes that a component of qualification is that the person *is competent to carry out a specified task*. This could give rise to argument and the Board suggests to avoid this it should be made clear that the person must be competent in the opinion of the Council so the latter part of the definition would read – *“and is in the opinion of the Council competent to carry out a specified task.”*

2.11 Value of a Tree

The Board considers that the actual system that will be used needs to be spelt out in the policy so as to give certainty. It is not sufficient to provide an example of the system that may be used.

2.12 Unacceptable Risk

The Board considers there needs to be more clarity in the policy about how the level of risk will be determined and how it will be determined that that level crosses the threshold of what is acceptable.

5. CONCLUSION

The Board requests that the council considers the matters set out above in relation to the Draft Tree Policy for Managing trees in public open spaces.



Debbie Mora

Chairperson Waipuna/Halswell-Hornby-Riccarton Community Board
Submissions Committee



Mike Mora

Chairperson Waipuna/Halswell-Hornby-Riccarton Community Board

Dated 13/10/20

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12 October 2020

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Hello,

Feedback on Draft Tree Policy

The Waihoru / Spreydon-Cashmere Community Board appreciates the opportunity to provide feedback on the Council's Draft Tree Policy. The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this feedback in its capacity as a representative of the communities in the Spreydon-Cashmere area.

Climate Change

Item 6.5 of the report in the Board's 6 October 2020 agenda, which asked the Board to decide whether it wished to provide feedback, noted the climate change impact considerations in the Draft Tree Policy. There is no mention of the direct local impact on the effect of climate change by the presence of trees, which includes shelter, shade and a lowering of the immediate local temperature of the air and water.

The Board would like some acknowledgement in the Tree Policy that states that trees sustain and protect flora and fauna (including stock) from some of the more severe local impacts of climate change.

Accessibility Considerations

Item 6.6 of the report in the Board's 6 October 2020 agenda, which asked the Board to decide whether it wished to provide feedback, noted that the Draft Tree Policy does not include accessibility considerations.

Council staff seldom understand that "Accessibility Considerations" in a Project Plan is a requirement to think about and comment on the project's impact on accessibility issues raised by the Project Plan, especially for people with a disability. Trees can enhance an environment for people with a disability, but of course can physically impact negatively on access for people with a disability as well. It means that thought has to be given to access for people with a disability when considering tree planting.

Policy Introduction

The term "Urban Forest Plan" is academic speak from the northern hemisphere for trees in the city. In Aotearoa New Zealand, the Board would like to see the language reflect our nomenclature and for the plan to be called the "Urban Bush and Forest Plan."

Tree Planting

Draft Policy 1.4 identifies non-urban areas as where indigenous biodiversity will be practiced. The Board is opposed to this plant apartheid. There are many urban places, including along our rivers, where endemic and native plantings are entirely appropriate and preferable. Indeed, given the controversy over leaves, native plantings can include street trees as well.

Thirteen years ago, there were many references to building a tree bridge and pathway between our suburbs and that of Banks Peninsula to encourage tui, kereru and other native birds into the city. We are one of the few cities in New Zealand where our native birds are not seen or apparent and this is a sad absence in our lives.

Tree Replacement

Draft Policy 1.9 states that for every tree removed a minimum of two new trees will be planted. While this is also the current policy, it does not always happen.

Community Planting

This paragraph requires that the Community Board provides approval for community-initiated tree planting. This does not happen at the moment.

Maintenance of Trees in Public Places

Draft Policy 2.7 requires that a complainant pays where pruning (and under Policy 4 for tree removal) when this benefits the complainant only. While the Board is sympathetic to this, we are concerned that someone without means will not be heard or cooperated with as much as are those with financial resources.

Tree Risk

While the Draft Policy acknowledges the potential general risk posed to people and property by trees, the Board would like the policy to include specific acknowledgment of the accessibility risk posed to people from, for example, exposed tree roots and fallen branches.

Removal of Trees

There is no reference to the role of Community Boards for the removal of unhealthy or structurally unsound trees. Currently Boards are meant to be advised if an unhealthy tree is to be removed, but this does not always happen.

Public Requests for Tree Removals

The Board supports Draft Policy 4.16 that states that, "Requests for removal of tree(s) will be considered for health reasons where there is a confirmation from either the applicant(s) medical practitioner, a clinical immunologist or the medical officer of health confirming that the tree(s) is/are the sole cause of the applicant(s) condition and that removal of the tree(s) is the sole option available for improving the applicant(s) condition."

Definitions

"Best industry practice" refers to British and Australian standards. The Board requests that clarification about how these standards are applied to endemic New Zealand trees is included in the policy.

Finally, just outside Noosa National Park, a few years ago there was a large sign blocking a house's view of the sea which said: "This sign replaces a beautiful tree that was deliberately poisoned." The Board would like Christchurch to adopt a similar policy to be used in these circumstances.

The Board would like to speak to its feedback.

Yours sincerely,

Karolin Potter

Karolin Potter
Chairperson, Waihoru / Spreydon-Cashmere Community Board

Submission ID 34940 - Colin D Meurk

Comments on Draft Tree Policy

12th October, 2020

Introduction

We need to transition from 'identity as garden city' to identity as an Aotearoa Eco-City'.

We are facing a biodiversity emergency on the planet, in nz and especially in Canterbury/Otautahi.

Council has signed up to 'ecological emergency' of which biodiversity is the place-based part for which we have particular responsibility as Kaitiaki.

There needs to be a clear mover to balancing the tree stocks with at least a 50% visible presence of nz noble trees. There doesn't seem to be a statement about a like-for-like replacement policy but it is implied in reference to the 'garden city'. Putting in place more European noble trees means they are there dominating the landscape for another 200 years. That leads to extinction of experience and then extinction of (native) species.

The fact is that a citizen survey in the early 2000s indicated 56% of chch citizens wanted more native plants in their neighbourhood and 75% wanted more native birds in their neighbourhood (and 6% wanted fewer). But a recent survey shows the figure is now 78% want more native plants. We need to 'get with the programme' and actually follow the trend towards identifying with the native flora and dependent fauna rather than what has tended to happen – over-listen to the squeaky wheels.

As well as the (22) envtal, economic and social benefits we should emphasise the cultural values – the reference to taonga that underpin Maori use, folklore and tradition.

as well as maximising benefits, using the right trees in right place (indigenous spp) it acts as a model for others.

It seems that the UFP should align with tree policy rather than other way around.

Purpose

Should guide private land as well – provide leadership.

And there should be more stringent rules about biosecurity risks – not just the official lists but those that science anticipates will become problems of the future. Need to act now to nip them in the bud.

'Community aspirations' should be viewed in light of citizen surveys not squeaky wheels.

Some of aspirations should include landscape legibility, natural character, ecological function/connectivity, and biosecurity (management).

Policy scope

Note sure why native revegetation or regeneration and plantation forestry should not be part of a city tree policy. Seems fairly critical and makes up a lot of what is happening.

Tree Planting

Yes to 'right plant – right place – right time'. I'm currently rebuilding an app for this.

Policy

- 1.1 use 'ecological' rather than 'environmental' wherever whole ecosystem and life is being referred to. There is a tendency for 'envt' to be relegated to being just about the physical envt.
- 1.2 I note the new Victoria St planter 'boxes' – which is fine (and know the person that instigated it) but again should have included a mix of indigenous species instead of stamping someone else's maples all along our significant carriageways. Problem is it normalises 'someone elses' heritage.
- 1.3 ... and overcoming biodiversity emergency
- 1.4 This is the wider point I repeat here. It sounds good but in the unintended consequence is that it reinforces the polarisation of nature belonging out of site and out of mind and 'culture' (code for exotic spp) being in heart of city – where the most significant stuff is.
- 1.5 There needs to be better understanding and requirement of especially native evergreen trees planted as large nursery specimens for more assiduous watering regime during first couple of summers – there are whole lot of \$1000 totara dead in streets in Wigram village (see figure) – some may have been lost due to ring barking by weed/grass maintenance!



Tree Replacement

See earlier comments on like-for-like. Need to have a target of >50% of noble native trees in all visible public places. And where there is a large tree being removed the number of replacements should follow a formula like: $N = \text{age of tree} / \text{age of replacements}$. Thus if a 100 year old (native) tree is being replaced by 10 year old trees then $N = 10$.

Commemorative Trees

Important not to put all eggs in one basket. A cluster of trees will ensure that at least one survives in the long term.

Tree Maintenance

Policy 2.1 why can't we allow tree canopies to form over footpaths and cycleways – it is covered by final sentence.

2.3 The whole 'safer parks' policy needs to be reviewed. There is no proof that dense vegetation is any more risky than open spaces. It needs more ecological input.

2.6 ... in opinion of arborist (and ecologist). And use ecological rather than environmental.

Ecological improvements

... contribution to the ecology of the city ...

Policy 2.12 Provide targets for indigenous trees.

Tree Value

Policy 3.5 place premium on indigenous ... and negative for biosecurity

Removal of Trees

... public health, safety or biosecurity risk ...

Policy 4.7 include also removal of parent/source trees

4.15 ... tree report prepared by a technician arborist and ecologist ...

Definitions

Maybe include notable and noble and significant or heritage trees

Tree – good fairly flexible. There has traditionally been a resistance to the more idiosyncratic shapes and slower growth of nz trees. Some woody native plants may reach 5 m but probably don't have 150mm dbh – e.g. *Coprosma rotundifolia*.

There has been the most stunning display of golden kowhai over this past winter/spring. Indeed one could argue for chch to be named the kowhai-korimako city. There should be much more of these thru the city – they have far more extensive flowering season than the fashionable cherry blossoms.

There are now increasing numbers of native plants performing well as street trees despite past prejudice – manatu, totara, horoeka, kowhai (see below), tarata. We should increase this palette to include matai, houhere (narrow-leaved), kanuka, hinau, rohotu and in wetter ground – kahikatea and pokaka.

The quid pro quo is that these slower growing species need to be grown on in preparation for increasing plantings of the future – to overcome their slow growth. Slowness should be regarded as a quality not a detriment. AND they need special maintenance (watering) until the roots have caught up with the stems.





Royal Forest and Bird Protection
Society of New Zealand Inc.
P O Box 2516
Christchurch
New Zealand

www.forestandbird.org.nz

12 October 2020

Christchurch City Council
Attention: Kim Swarbrick

Supporting document to online submission

Re: Draft Tree Policy

Tena kōe,

Re: Draft Tree Policy

1. Forest & Bird is New Zealand largest independent conservation organization. Our mission is to protect New Zealand's unique flora and fauna.
2. Forest & Bird generally supports the draft Tree Policy for all trees on the Christchurch City Council parks, reserves, roads and other public spaces. We acknowledge that both native and exotic trees can be important habitat and food sources for native species, therefore a tree policy that recognizes this is important.
3. We strongly support the following statement:

Trees play an integral part in reinforcing our identity as the Garden City, a reputation which many Christchurch residents pride themselves on. As well as their aesthetic values, trees also provide a range of other essential environmental, economic and social community benefits. With the current challenges being faced through climate change, the vital role which trees play in sequestering carbon, cooling through shade and managing storm water has never been more important.

4. Forest & Bird strongly encourages the council to take a leadership role in the management of trees to ensure that the many benefits provided by this vital resource are maintained for future generations, *and* for the maintenance and enhancement of habitat for indigenous biodiversity in the Christchurch City. This will help the Christchurch City Council meet its obligation under the Resource Management Act 1991 s 31.¹
5. We strongly support the development of an Urban Forest Plan which we recommend the Avon Ōtākaro Corridor Regeneration Plan and the "Green Spine" be at the core of. There is a strong expectation that the council will ensure that the implementation of an Urban Forest Plan will be adequately resourced.

¹ Specifically RMA section 31 (1)(b)(iii)

6. The draft Tree Policy could be improved by adding the following:
 - a) A policy that requires an ecological assessment for the presence of indigenous fauna, especially roosting or nesting native birds, before any tree maintenance, earthworks and construction near trees and tree removal, is undertaken.

The findings of an ecological assessment including methods to protect and preserve resident native fauna needs to be incorporated into any Tree Protection Management Plan (TPMP). With regard to maintenance, earthworks and construction, any TPMP should also include methods that demonstrate how the structural integrity of a tree including the root zone, is protected.

- b) A policy that explicitly requires eco-sourcing and eco-planting for planting and replanting native trees.

Forest & Bird recommend that Policy 1.4 be strengthened to include all areas, not just sites of ecological significance. "Best endeavor" is too uncertain and could be strengthened. This policy could explicitly require eco-sourcing and eco-planting of plants when selecting replacement trees or planting new trees.

7. Attached to this submission for your reference, is correspondence between the Canterbury Botanical Society and Environment Canterbury regarding an urgent call for a Canterbury Regional Policy on eco-sourcing plants (November 2018); and the Canterbury Regional Council Guidelines for native plant procurement and eco-sourcing (August 2019).
8. Furthermore, consideration could be given to the use of fire resistant native species, especially in parts of the district administered by the council, that are deemed at risk to wildfire.

Thanks for the opportunity to provide feedback.

Nāku noa, nā



Nicky Snoyink
Royal Forest and Bird Protection Society of New Zealand Inc.
Regional Conservation Manager Canterbury/West Coast

Email: [REDACTED]

Phone: [REDACTED]



Guidelines for native plant procurement and ecosourcing

Ecosourcing protects and enhances biodiversity values by using appropriate plants for an ecological area and the environmental conditions.

It requires propagation of native plants from a representative sample of the local wild population for plantings into appropriate habitats.

Environment Canterbury encourages the use of ecosourced native species for all planting projects, and ecosourcing is a requirement for Environment Canterbury-funded projects.

What is ecosourcing?

Ecosourced plants are those grown from seeds collected from naturally occurring vegetation in a locality close or appropriate to where you intend to plant them as part of a native planting project. Specifically:

- Plant species shall be known to be native to the local area, either present or past.
- The closer the seed source to the restoration project, the better (in most cases).
- Seed should be collected from a similar ecosystem to the one being restored.
- Planning for planting projects must allow for the timeframes involved in collection and propagation of ecosourced plant material.
- Collection of seeds or propagules should take place from areas of native vegetation which are clearly of natural origin and unlikely to be pollinated by garden origin plants.

What should you consider for your planting project?

- Decide which native plants can be used for a project.
- Involve Environment Canterbury biodiversity experts at an early stage to advise on appropriate species and where they should be sourced from or review alternatives.
- Establish realistic timeframes for seed collection and propagation.
- Factor in costs and timing for plant propagation (this may require staged payments) into funding arrangements.
- Liaise with iwi in relation to plant collection and intended use, including seeking acknowledgement of whakapapa and cultural practices associated with collection and use of plant material and issues relating to wāhi tapu.
- Ensure you have permission to collect.
- Include clear expectations of ecosourcing requirements in plant procurement – for example:
 - specify plant species and where they should be sourced from in request for proposal;
 - supplier should be able to verify and make available records for audit of plant sourcing; and
 - consider any specific expectations for plant maintenance and weed management.
- Work with your plant provider:
 - Apply the DOC and Waitakere guidelines (ref below) for ecosourcing and seed collection.
 - Adhere to project-specific recommendations for seed sourcing (NB this may differ from the DOC and Waitakere guidelines).
 - Maintain records of seed source location (coordinates), number of plants collected and date to verify plants are correctly sourced.
 - Ensure that the plant species collected is in fact the plant species you believe it to be – for example, it may be necessary to collect some vegetative material to get expert confirmation.

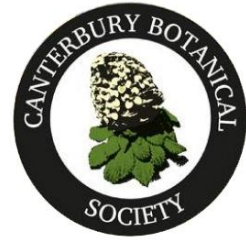


For more guidance on ecosourcing, please contact any of our biodiversity officers who will be able to help. Phone 0800 324 636 or email ecinfo@ecan.govt.nz.

For additional information or resources, see below:

- [Ecodistricts map](#)
- Community organisation support - <https://ecan.govt.nz/get-involved/support/>
- Biodiversity funding - <https://ecan.govt.nz/your-region/your-environment/our-natural-environment/biodiversity-funding/>
- Chris Ferkins, Ecosourcing - Code of Practice and Ethics (2002, published by Waitakere City Council)
- Te Ara Kakariki/Greenway Canterbury Trust - <https://www.kakariki.org.nz/resources/ecosourcing/>
- DOC - <https://www.doc.govt.nz/get-involved/run-a-project/restoration-advice/native-plant-restoration/ecosource-seeds>

Katherine Trought
Strategy and Planning
Environment Canterbury
P O Box 345
Christchurch 8140



[REDACTED]

cc: [REDACTED]
cc: [REDACTED]
cc: [REDACTED]
[REDACTED]
[REDACTED]

Canterbury Botanical Society
P.O. Box 8212
Christchurch 8440
info@canterburybotanicalsociety.org.nz

1 November 2018

Dear Katherine

Urgent call for a Canterbury Regional Policy on Eco-sourcing plants for revegetation

On the cusp of the One Billion Tree scheme the Canterbury Botanical Society is concerned that revegetation in Canterbury is compromised by the absence of a shared understanding about the ecological principles of eco-sourcing, eco-planting, and the appropriate geographical area to gather seed from.

In Canterbury, many ecologists, landscapers, seed collectors, nurseries, and landowners differ in their interpretation of the geographic boundaries to collect seed. This results in confusing and uncoordinated advice to landowners.

Plant nurseries, both commercial and non-profit, do not always use practices that result in genetically diverse plants. We have anecdotal evidence of plants labelled as “eco-sourced” that do not reflect the genetic diversity of the source populations due to nursery practices, for example plants grown from cuttings from one source plant.

The Canterbury Botanical Society supports eco-sourcing seeds and eco-planting. Eco-sourcing is a precautionary principle to maintain local strains of plants and national genetic diversity within a species. Collecting seeds from multiple wild plants, growing these on in a plant nursery, and planting back in their original native plant communities, will help restore those communities close to their original plant composition.

Eco-sourcing for genetic diversity is a fundamental principle for restoration. There is scientific evidence for significant genetic diversity between populations of the same species in New Zealand (the genetic differences in local strains of manuka have been exploited in the manuka honey industry).

“In plant conservation, restoration (the augmentation or reestablishment of an extinct population or community) is a valuable tool to mitigate the loss of habitat. However, restoration efforts can result in the introduction of novel genes and genotypes into populations when plant materials used are not of local origin. This movement is potentially important because many plant species are subdivided into populations that are adapted to local environmental conditions.” (McKay et al, 2005).

Eco-sourcing is not new. In 1976 the former Lands and Survey Department directed Forest and Bird groups to plant trees grown from seed within 3-5 kilometres of the planting site (see Appendix III):

This letter is prompted by a recent news report on a North Island nursery highlighting the issues with the end-user relying on assurances from the supplier that the plants were eco-sourced and ecologically appropriate to plant on the motorway project.

Many organisations, including Environment Canterbury, District Councils, Fish and Game, QEII Trust, Te Ara Kākāriki, Million Metre Stream projects, Footprint Trust, and volunteer restoration groups rely on the expertise of the contractor to supply eco-sourced plants. The supply chain can be long: from seed collector to seedling nursery to nursery or garden centre to contract planter to landowner. However, there are no supply chain traceability requirements for eco-sourced plants, or external audit standards.

There is no research we know of to show that the eco-sourcing process is working as intended in Canterbury. In contrast research on plantings in Hamilton City gullies demonstrated that the local eco-sourcing resulted in genetic diversity similar to nearby natural populations².

Environment Canterbury is the logical lead agency in this area due to its region-wide geographic coverage and biodiversity-focused programme *Step-change for Biodiversity*. Providing this leadership would also help meet targets in the Canterbury Regional Biodiversity Strategy, which Environment Canterbury is a signatory to.

The Canterbury Botanical Society calls on Environment Canterbury to take the lead to formulate a Canterbury-specific eco-sourcing and eco-planting policy. The extreme loss of natural vegetation cover in the Plains and inland basins means that applying standard eco-sourcing and restoration planting practice can be problematic.

An eco-sourcing and eco-planting policy would provide guidelines for each step in the supply chain. The Canterbury Botanical Society wishes to see these requirements incorporated in a Policy:

- An agreed standard amongst seed-collectors, nurseries, landscapers and revegetation contractors for a definition of eco-sourcing and eco-planting for ecological resilience.
- The Ngāi Tahu view on shifting plant material within and beyond the Canterbury region.
- A framework for traceability of eco-sourced plants from collection of seed to planting.
- An eco-sourcing labelling protocol so landowners and project managers can confidently buy appropriate eco-sourced plants.
- A clear, illustrated brochure to hand to landowners involved in restoration projects to show ecologically appropriate boundaries for different plant species.

Yours sincerely

Paula Greer

President, Canterbury Botanical Society

References

1. Stevens, Mark, I, Andrew C. Clarke, Fiona M. Clarkson, Mary Goshorn, Chrissen E.C. Gemmill. 2015. Are current ecological restoration practices capturing natural levels of genetic diversity? A New Zealand case study using AFLP and ISSR data from mahoe (*Melicactus ramiflorus*). *New Zealand Journal of Ecology* 39(2): 190- 197
2. McKay, John K.,Caroline E. Christian, Susan Harrison, and Kevin J. Rice. 2005. How Local Is Local—A Review of Practical and Conceptual Issues in the Genetics of Restoration. *Restoration Ecology* Vol. 13, No. 3, pp. 432–440
3. Norton, David A., Laura M. Young, Andrea E. Byrom, Bruce D. Clarkson, Phil O’B. Lyver, Matt S. McGlone and Nick W. Waipara. 2016. How do we restore New Zealand’s biological heritage by 2050? *Ecological management & restoration* vol 17 no 3.

Appendix 1: Background Issues

Confusion around what Eco-sourcing means in Canterbury.

- Landowners planning to revegetate land burnt by the 2017 Christchurch fires received conflicting advice about the best source of plants for an “eco-sourced” planting, ranging from nearby natural populations to Port Hills Ecological District to the whole of the Banks Ecological Region.
- Some ecologists wish to include plants in eco-sourced revegetation of species from warmer, dryer locations to create forest adapted for a future drier climate.
- The funding agreements for biodiversity grants for planting projects state “plants must be eco-sourced”, with no explanatory material.
- An internet search on the Environment Canterbury website for “eco-sourcing” native plants returns only one brochure (attached). This brochure defines “eco-sourcing” in a specific way, that is “same regions” and “same meso-climate” as the planting site.
- The Selwyn District Council and Ashburton District Council biodiversity grant agreements refer to eco-sourcing as seed gathered within their Council boundaries.
- Banks Peninsula has 3 Ecological Districts, the accepted boundary for eco-sourcing and eco-planting, yet both plant suppliers and purchasers often consider any plant from Banks Peninsula as “eco-sourced” for any Peninsula planting site.

Inappropriate nursery practices for growing revegetation plants.

- Failure to educate nursery staff and managers about eco-sourcing and eco-planting principles.
- Growing plants from cuttings, not seed, resulting in genetically identical plants.
- Growing plants from stock plants. If the species is single-sex, and planted without additional stock, then there is unlikely to be natural regeneration of that species at that site.
- Promoting the planting in revegetation sites of plant species labelled as eco-sourced when they do not naturally occur in Canterbury (eg. kauri, karo, pōhutukawa) or in a particular ecological area or district (eg marsh ribbonwood in inland sites).
- Collecting seed from planted revegetation sites, from trees with unknown provenance.
- Collecting seed from the same site, and the same plants, every year.

Lack of seed sources in Low Plains Ecological District.

- The Low Plains Ecological District has less than 0.5% of its original vegetation. Any eco-sourcing will be from a small number of relict plants, potentially reducing the genetic diversity in plantings.
- The Low and High Plains are run north and south yet the two dominant ecological processes of wind pollination and water dispersal run west to east, meaning plants have more in common with the Foothills, rather than either end of the Low or high Plains Ecological Districts.
- Eco-sourcing for Plains Ecological Region needs deep thought about whether to restore the vegetation cover at European settlement, pre-Maori vegetation, match the current modified soils and drainage, or aim for corridors for flora and fauna to move across the Plains.

Supply issues.

- For most species, seed can only be collected at particular times of the ~~one~~ a year. It can then take 2-5 years to grow some species to a size that can be planted out.
- Seed supply varies between years. Factors include pollination, insect infestations of the seeds, and ~~the~~ masting phases. Seedlings cannot always be produced to order, for example, kanuka seed is only viable for 2-3 months, and pokaka seed can take up to seven years to germinate.
- In the absence of suitable eco-sourced plants, nurseries can be financially driven to substitute the required eco-sourced plants with inappropriate plants to comply with contracts and timeframes more aligned to the financial year than the seasons.
- For planting sites outside Christchurch City there is a lack of eco-sourced plants. It is hard to source local plants for Environment Canterbury-funded projects in Waimakariri and Ashburton.
- Where funding is an issue and community groups are involved, plants tend to be sourced wherever they can be found at an economic price, which is a common source of the odd assortment of non-local plants or hybrid stock
- The present timeframe requirements for completion of biodiversity grants from Environment Canterbury and other Councils often do not support best-practice eco-sourcing when they require projects to be done in one financial year.

Eco-planting of equal importance.

- Eco-planting is the short-hand term we have adopted to mean planting eco-sourced seeds back into ecologically appropriate habitats within the Ecological District the seed was harvested from.
- Once in the right site, the plant species then need to be sited for optimal aspect, exposure, soil, and moisture regime. Setting out plants is a skill that requires a deep knowledge of where the plant species naturally grow. This step is often overlooked rushed, sandwiched between the delivery of the plants and the arrival of the community planting volunteers. Failure to match the species with the micro-habitats wastes plants that fail to thrive.
- Failure to maintain plantings, that is, keep browsers at bay, grass and other weeds down until the plants are tall enough, is a common reason for plantings not achieving the vision of a future forest or wetland. Poor maintenance techniques kills plants through weed-eaters, mowers, and herbicide spray drift.
- Community groups can find it hard to source ecologically planting advice. In fact, organisations have the same issue. In the past The Canterbury Botanical Society has written to Orion about newspaper advertisements listing mahoe and tree fuchsia as suitable for planting under powerline on the Canterbury plains. The ECAN Waterways Advice sheet on the ECAN website suggesting bog pine (a glacial outwash species) and wire rush (a West Coast species with an aberrant population on Mt Grey) for Canterbury Plains wetlands (search for “What to plant in Canterbury lowland freshwater wetlands”).
- Mycorrhizal associations in restoration plantings is a new research area. The lack of the optimal mycorrhizal partner can affect the plant’s growth for life (4).

Reference:

4. Davis, Murray, Ian A. Dickie, Thomas Paul, Fiona Carswell. 2013. Is kanuka and manuka establishment in grassland constrained by mycorrhizal abundance? *New Zealand Journal of Ecology* 37(2): 172- 177

Appendix II: Environment Canterbury Ecosourcing brochure

There is little public information about eco-sourcing on the Environment Canterbury website. This is the only document that appears on a public search for “Ecosourcing”/”ecosourced plants”/”eco-source*” (1 November 2018).



Ecosourcing Native Plants

Protecting the integrity of Canterbury's flora

What is ecosourcing?

Ecosourcing refers to the use of locally sourced plant material for restoration plantings.

Ecosourced plants are those grown from seeds collected from naturally occurring vegetation in the same region as those to be planted and which share the same meso-climate (ridge line, gully, frosty area, dry area, soil type). These regions can be identified as the high country, foothills, plains, coastal and Banks Peninsula.

Why ecosource?

Many of New Zealand's plants have adapted to local conditions, developing distinct attributes which give the species resilience against a changing environment or threats such as plant diseases.

Through ecosourcing, we can maintain this resilience and also achieve greater planting success because the plants will be adapted to local conditions and are therefore more likely to survive. This practice ensures that genetic diversity is maintained throughout New Zealand.

Under the New Zealand Biodiversity Strategy, Environment Canterbury's responsibility is to:

"Maintain and restore viable populations of all indigenous species and subspecies across their natural range and maintain their genetic diversity."

When to ecosource

Ideally all native plantings should use ecosourced plant material. Ecosourcing is most important for planting near natural areas of native vegetation, particularly if the plant species is threatened or if the species is known to be highly variable across different climates, landforms and soils.

Some species which are wind-pollinated have fewer geographic differences because their seed is naturally distributed over long distances, whereas bird or insect-pollinated plants are more likely to distribute their seed locally and therefore display distinct adaptations to local conditions.

Everything is connected

 Environment
Canterbury
Regional Council
Te Kaitiaki Take Kōwhiri

Appendix III: 1976 Lands & Survey Ecosourcing Guidelines

ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND INC

To ALL SECRETARIES - Copy of a letter received from the Director General, Dept. Lands & Survey - for your information.

"In conjunction with the Scenic and Allied Reserves Committee of the National Parks Authority, the Department of Lands and Survey has adopted a set of guidelines for planting in scenic and similar reserves. From time to time it is necessary to undertake this type of activity to protect the natural values of a reserve and the guidelines are intended to ensure that the planting not only achieves its purpose but also the original purpose of the reservation is not prejudiced. "

"The guidelines may be summarised as follows: -

1. The aim should be to ensure that the proper kinds of plants are grown. The planted species should be -
 - a. native to the surrounding district.
 - b. already present or known to have been present in the proposed planting area
 - c. planted in ecologically appropriate places.
2. As plants of the same species may have genetic differences throughout their range, seed or young plants should be obtained from the same patch of vegetation or the same catchment or island, say within 3 - 5 kilometres of the reserve.
3. Exceptional circumstances may involve the introducing of a native plant to an area where it does not exist at present in order to prevent it, or a species of animal or plant dependant on it, from becoming extinct. Similarly, circumstances such as extensive roadworks may arise where native planting material not meeting the above requirements must be used because the alternative is gorse or broom. In both cases scientific advice should be sought.
4. The ornamental value of popular native species such as pohutukawa or kauri does not exempt them from these guidelines.
5. A record of planting and the success obtained should be kept.

As the members of your organisation are in some cases responsible for the administration of reserves you may care to draw these guidelines to their attention. The aim is to ensure that where planting is necessary it is not prejudicial to the best interests of the reserve and your cooperation would be appreciated. "

28th April, 1976

(Mrs) Olga Langford,
National Secretary.

Tree value is a point that is included in the Draft Tree Policy, and there is also specific mention of the fact that in order for trees to be acknowledged for the value which they provide to the city, there needs to be a valuation system in place.

The introduction of the Tree Policy mentions that trees play an integral part in reinforcing our identity as the Garden City, that trees have aesthetic value as well as other social benefits, and that the Council understands the need to take a leadership role in the management of trees to ensure the benefits provided by such a vital resource are maintained for future generations.

In light of this it is disappointing and surprising that the Scope of the Tree Policy has failed to prioritise the quality of the environment by not including trees located on private land in the policy, that the biodiversity of those trees is not more greatly valued, and that the stewardship of those trees isn't being exercised through every means available in order to meet the challenge of climate change. This is particularly concerning when in the Residential Central City and Medium Density Zone the urban forest is being lost at an alarming rate due to developers clear felling properties for high density housing, and the general loss of trees on other properties being re-developed.

This suggests that the CCC are not living up to several extracts from the CCC's Principles, Community Outcomes and Strategic Priorities outlaid in the CCC's Strategic Framework, namely:

- **The Principle** of *"Taking an inter-generational approach to sustainable development, prioritising the social, economic and cultural wellbeing of people and communities and the quality of the environment, now and into the future"*
- **The Community Outcomes** of *"Liveable city - 21st century garden city we are proud to live in" and "Healthy environment - Unique landscapes and indigenous biodiversity are valued and stewardship exercised"*
- **The Strategic Priority** of *"Meeting the challenge of climate change through every means available"*

<https://ccc.govt.nz/assets/Documents/The-Council/How-the-Council-works/StrategicFramework/2020-Strategic-Framework.pdf>

In 2016 Christchurch City Council withdrew protection from 1200 trees on private land. This drew criticism from former City Councillors and two of the Council's own arborists, one of whom stated in a submission to the Council, *"There was no reason to reduce the current number of notable trees on private land by 75 per cent. There is no public mandate for this and there was no public consultation. Trees on private property were [already] threatened by potential development"*.

He was unhappy that the new plan removed a rule that enabled subdivision trees to be protected. The rule's removal increased certainty for developers and people wanting to subdivide their sections, but the majority of protected trees in the city were protected either under the rule or as a condition of resource consents.

The Council arborist stated that he was worried it will be much easier in the future for subdividers to get rid of trees which should be preserved.

<https://www.stuff.co.nz/the-press/news/christchurch-earthquake-2011/76383155/tree-protection-change-rankles-christchurch-residents>

His worries sadly were well founded, and the city has born witness to numerous significant trees being clear felled on properties that were subject to intensive development. Fast forward from 2016 when the list of protected trees on private was slashed by the Council, in May of 2019 the City Council declared a climate emergency.

So why are trees on private land not featuring in this Draft Tree Policy? Not only has the list of protected trees been hugely reduced, but removing the protection on them is in stark contrast to the Council's own website which has a page dedicated to the benefits of trees.

<https://ccc.govt.nz/environment/trees-and-vegetation/benefits-of-trees>

The page speaks of how development and urban intensification add to the following:

- *Transport related greenhouse gas emissions;*
- *rises in urban heating;*
- *and increased storm water runoff due to increased amounts of hard impermeable surface.*

There are documented cases where environmentally concerned residents have lobbied the City Council with deputations pleading for large numbers of trees to be saved.

58 Perth Street in Richmond is one such case, and a sad example at that where every tree on the property was destroyed, resulting in the absolute destruction of the habitat in which birds and other wildlife lived. This move also completely eradicated the leafy vista the community valued and enjoyed. The lawns and gardens that previously filtered pollutants were also eradicated by the developer. They were replaced with enormous swathes of cement and the very bare minimum of "garden strips" required under the District Plan.

Instead of being filtered by the land and into the roots of the trees, pollutants will now flow directly into the stormwater system, resulting in toxic contaminants pouring into our rivers. This is neither ecologically nor environmentally friendly.

Does Christchurch City Council want our rivers to be strewn with dead fish and our residential areas of the city to become a concrete jungle, or do you want the city to be a beautiful, healthy urban jungle thriving with life?

The difference in the before and after photographs of this one example speak for themselves.

BEFORE



AFTER



Under the current District Plan and Tree Policy these confronting images do not paint a pretty picture for in a city that wants to be a 21st century garden city, nor for a city that has declared a Climate Emergency.

Developers removing existing trees are replacing them with far fewer trees, and trees that won't reach the same heights at maturity as those they rip out of the ground. As a result of those choices, Christchurch is finding itself with a diminished density of the urban forest.

If the Council understands the need to take a leadership role in the management of trees to ensure the benefits provided by such a vital resource for future generations, why are trees on private property not being included in this Tree Policy?

The Council are aware of the benefits trees have of cooling hard surfaces in urban areas where temperatures are higher than surrounding rural areas. The Council are also aware that trees restrict unwanted weed growth in waterways, and manage stormwater flows through tree canopies and root systems up taking and processing excess ground moisture.

This of course also doesn't take into account how significant trees on private land also contribute to providing shelter and food for a variety of birds and small animals through their flowers, fruits, leaves, buds, and woody parts, nor the fact they provide nesting sites birds and small animals, including native bats.

These trees also provide habitats for other plant life, including parasitic plants that live directly off the tree by feeding from it, or epiphytes which use the tree as support. Decomposing leaves, twigs and non-woody roots increase soil fertility and structure for soil borne organisms including bacteria, fungi, protozoa, nematodes, arthropods and earthworms.

They also create a protective environment that allows the growth of plants that would otherwise not be there (e.g. shade dwelling or frost tender plants), and contribute to overall plant biodiversity as well as indigenous and endemic biodiversity.

By not addressing the significant loss of trees on private land, the City Council is ignoring the large amount of evidence that now demonstrates that exposure to nature in the form of trees, grass, and flowers offers positive interactions that generate extensive physiological, social, and mental wellness benefits that can help alleviate the burden on the health system.

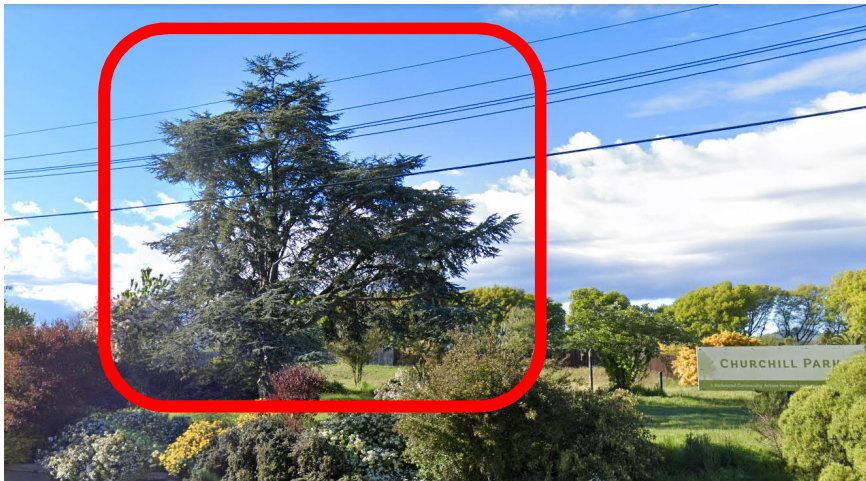
The Council's webpage on trees also notes the benefits trees have on mental wellness. It discusses how trees and vegetation have many positive benefits for the community by providing and allowing daily interaction with nature, and goes on to say how trees contribute to the liveability of Christchurch by naturalising, and humanising built environments, through softening hard surfaces and harsh outlines of buildings, complementing building development, and screening unsightly and undesirable views.

An Urban Forest should be more than just trees forming a grid pattern following the roadways of the city, and the fringe of parks. A true urban forest should span the entire city, including residential areas of the city where trees are not planted on the roadsides, or as is the case in many of the

original city neighbourhoods, trees are not able to be planted due to streets being too narrow to do so.

Andrew Rutledge, Head of Parks at CCC has said “work is also under way on a wider Urban Forest Plan, which will provide strategic direction for all Christchurch trees, and will look at scenarios like increasing our tree population, improving biodiversity outcomes and considering the role trees play in addressing climate change.”

In order to achieve that successfully, shouldn't that work on the Urban Forest Plan be done in conjunction with the Tree Policy? Shouldn't it also be written into the District Plan in order to combat the NPSUD (National Policy Statement on Urban Design) that central Government recently adopted which is seeking more intensification in the residential parts of the city, and will invariably result in the loss of even more trees if measures are not rapidly taken to protect existing trees, including those on private land?



This healthy tree located on private property was recently felled in Guild Street, Richmond, due to a lack of regulation which would have otherwise protected it. It was the tallest tree on the street, was visible from a great distance, and is therefore a significant loss.



A. Grated tree pit



B. Trees with permeable paving



C. Open tree pit



D. Infiltration trenches and wells



E. Trees in raingardens



F. Trees in grass verges

Design response matrix

● Green = Suitable ● Yellow = May be suitable [-] = Unlikely to be suitable

Increasing space for green infrastructure →

| | | A. Grated tree pits | B. Trees with permeable paving | C. Open tree pits | D. Infiltration trenches and wells | E. Trees in raingardens | F. Trees in grass verges | G. Sheet flow* to grass and trees |
|--|---|---------------------|--------------------------------|-------------------|------------------------------------|-------------------------|--------------------------|-----------------------------------|
| Generally increasing movement significance | Generally increasing place significance | 1. Pedestrian zone | ● | ● | - | - | ● | - |
| | 2. Neighbourhood zone | ● | ● | ● | - | ● | - | - |
| | 3. Urban street | ● | ● | ● | - | - | - | - |
| | 4. Suburban street | - | - | ● | ● | ● | ● | - |
| | 5. Activity street | ● | ● | - | - | ● | ● | - |
| | 6. Boulevard | - | - | - | ● | ● | ● | - |
| | 7. Major thoroughfare | - | - | - | ● | - | ● | ● |
| | 8. Freeway | - | - | - | - | - | ● | ● |

* Sheet flow refers to wide shallow movement of water across a surface, as distinct from concentrated overland flow in channels or narrow flow paths. In this context, sheet flow refers to water that spreads across the length of the roadway into the adjacent verge, rather than flowing through dedicated channels, inlets and entry points.

SUBMISSION TO: Christchurch City Council

ON: Draft Tree Policy

BY: Te Pātaka o Rākaihautū/Banks Peninsula Community Board

ADDRESS: Lyttelton Service Centre
PO Box 73027
CHRISTCHURCH 8154
Email: adrianna.hess@ccc.govt.nz

DATE: 12 October 2020

1. INTRODUCTION

The Te Pātaka o Rākaihautū/Banks Peninsula Community Board (the “Board”) appreciates the opportunity to provide a submission on the Draft Tree Policy.

2. SUBMISSION

By way of an opening statement, the Board’s overarching lens is that environmental stability and biodiversity is of prime importance to Council projects. The Board supports projects that increase native vegetation, which will support our native fauna and mitigate the hazards associated with the Climate and Ecological Emergency.

The Board supports the following proposed provision regarding tree planting, as this aligns with the strategic priorities above:

- *The Council will prioritise the planting of native trees at the beginning of the planning process for new developments.*

The Board believes there has not been sufficient consideration given to the planting of native species in this draft document. The Board considers that some species are more fire resistant than others and should be prioritised according to application. Therefore, the Board supports the incorporation of a list of preferred native species pertinent to the following applications.

Native species of low flammability that are suitable for green breaks or safety zones, include:

- fuchsia excorticata - commonly known as tree fuchsia, New Zealand fuchsia and kotukutuku
- pseudopanax crassifolius - commonly called as horoeka or lancewood
- pseudopanax arboreus – commonly called five finger, puahou or whauwhaupaku
- coprosma robusta – commonly called karamu
- coprosma grandifolia – commonly called kanono or raurēkau
- geniostoma ligustrifolium - commonly called hangehange
- coprosma australis – commonly called kanono or raurēkau
- coprosma repens – commonly called tree bedstraw, taupata, mirror bush, looking-glass bush, New Zealand laurel and shiny leaf

- *carpodetus serratus* – commonly called putaputawētā, marbleleaf and bucket-of-water-tree
- *corynocarpus laevigatus* – commonly called karaka or New Zealand laurel
- *griselinia littoralis* - commonly called kapuka, New Zealand broadleaf or papauma
- *griselinia lucida* - commonly called puka, akapuka or shining broadleaf
- *macropiper excelsum* – commonly called pepper tree and kawakawa
- *solanum aviculare* - commonly called New Zealand nightshade and poroporo

Native species of low to moderate flammability that are not recommended for planting in green breaks, but that are still suitable for use where elevated dead material and litter are removed regularly, include:

- *hebe salicifolia* - commonly called willow-leaf hebe
- *hebe stricta* - commonly called koromiko
- *melicytus lanceolatus* - commonly called narrow-leaved māhoe or māhoe-wao
- *melicytus ramiflorus* – commonly called whiteywood and māhoe
- *aristotelia serrata* - commonly called wineberry, makomako or mako
- *coriaria arborea* – commonly called tutu
- *myoporum laetum* - commonly called ngaio or mousehole tree
- *pittosporum crassifolium* – commonly called karo
- *pittosporum eugenioides* - commonly called lemonwood or tarata
- *hoheria* - includes six species commonly called manatu, lacebark and ribbonwood
- *knightia excels* - commonly called rewarewa
- *nothofagus menziesii* - commonly called silver beech and tawhai
- *phyllocladus glaucus* – commonly called toatoa and blue celery pine
- *plagianthus regius* – commonly called ribbonwood and manatu but is also known as houī, manauī manatu, puruhi and whauwhi
- *weinmannia racemose* - commonly called kamahi

This list of native species is not exhaustive to our region, and therefore other species not listed above should be considered if they are deemed suitable to each application.

Yours sincerely,

Tori Peden

Chairperson

Te Pātaka o Rākaihautū/Banks Peninsula Community Board

CHRISTCHURCH CITY COUNCIL DRAFT TREE POLICY

SUBMISSION ON THE DRAFT POLICY BY ORION NZ LTD

To: Christchurch City Council
PO Box 73 016
CHRISTCHURCH 8154

Submitted by email: Kim.Swarbrick@ccc.govt.nz

Name: ORION NZ LTD

Address: PO Box 13896
Christchurch 8141

(Please note the different address for service on page 3)

SUBMISSION BY ORION NZ LTD

Orion NZ Ltd (Orion) lodges the following submission (including Appendices) on the Christchurch City Council Draft Tree Policy (the Policy). The Policy has been prepared to provide guidance for the management and maintenance of trees in public open spaces. Fundamentally, Orion seeks amendments to the Policy to ensure that it provides appropriate recognition of Orion's distribution network within such spaces and supports compliance with the Electricity (Hazards from Trees) Regulations 2003.

Background

Orion New Zealand Limited (Orion) owns and operates the electricity distribution network covering approximately 8000 square kilometres across Christchurch and central Canterbury between the Waimakariri and Rakaia Rivers.

Christchurch City Holdings Limited (owned by the Christchurch City Council) owns 89% of Orion and the Selwyn District Council owns the other 11%.

Orion distributes electricity from the national grid (owned and operated by Transpower) to service approximately 204,000 homes and businesses and plays a central role in the electricity industry providing both essential support and lifeline services for the electricity market and critical infrastructure.

Broadly, Orion's electricity distribution network comprises underground cables, overhead lines, substations/transformers/kiosks, electricity structures (poles/pylons, earth rods and associated buildings) and access tracks. Orion is responsible for the installation, maintenance, repair and upgrade of the electricity network.

This Submission and the Relief sought:

The **Electricity (Hazards from Trees) Regulations 2003** (the Regulations) primarily covers the maintenance and trimming of trees near overhead power lines. Trees or other vegetation coming into contact with overhead lines can cause damage and/or interrupt supply. In essence, the Regulations promote safety and assist in maintaining a secure and reliant electricity supply by:

- Prescribing distances from electrical conductors within which trees must not encroach;
- Setting rules about who has responsibility for cutting or trimming trees that encroach on electrical conductors; and
- Assigning liability if those rules are breached

Tree owners have the primary obligation to ensure compliance under the Regulations and the Christchurch City Council owns many trees in streets, road reserves, parks and other public spaces.

Works associated with the establishment and maintenance of trees in public spaces also have a similar potential to adversely impact on underground cables.

Given the above, **Orion seeks** amendments to the policy to ensure appropriate recognition of the above and to ensure processes and procedures are in place to reduce risk to the network. The changes sought to the policy are annotated on the draft Tree Policy attached as **Appendix One**. Please note this is a word version of the policy with the graphics removed.

Orion wishes to be heard in support of this submission.

Thank you for the opportunity to make this submission.

SIGNED for and on behalf of

Orion NZ Ltd



.....
Darryl Millar

Director

Resource Management Group Ltd

Authorised agent for, and on behalf of Orion NZ Ltd

12th October 2020

Address for service of person making the submission:

Orion NZ Ltd

C/- Resource Management Group Limited

PO Box 908 Christchurch Box Lobby

CHRISTCHURCH 8140

Attention: Darryl Millar

Telephone: [REDACTED]

Email: [REDACTED]

APPENDIX ONE: PROPOSED AMENDMENTS TO THE DRAFT TREE POLICY

APPENDIX TWO: NOTICE AND GROWTH LIMIT ZONES

APPENDIX THREE CABLE DAMAGE

Christchurch City Council

Draft Tree Policy

**Our policy for managing
and maintaining trees in
public open spaces.**

Tell us what you think by Monday 12 October 2020.

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Introduction

Trees play an integral part in reinforcing our identity as the Garden City, a reputation which many Christchurch residents pride themselves on. As well as their aesthetic values, trees also provide a range of other essential environmental, economic and social community benefits. With the current challenges being faced through climate change, the vital role which trees play in sequestering carbon, cooling through shade and managing stormwater has never been more important. We understand the need to take a leadership role in the management of trees to ensure that the many benefits provided by such a vital resource are maintained for future generations. Through proactive management of trees on public land these benefits can be maximised and retained for the future.

We are currently developing an Urban Forest Plan which will address the strategic planning of our urban forest. Our Tree Policy will align with the Urban Forest Plan and should be read in conjunction with it once this is in place.

Purpose

This policy provides guidance for the planting, protection, maintenance and removal of trees on land we own and look after. It aims to help manage trees to meet community aspirations, service requests, manage effects of trees on infrastructure and provide clarity for decision making while maintaining consistency in the approaches taken by us and our contractors.

Policy scope

This policy includes all trees on land we own and look after, whether planted or self-seeded, including parks, reserves, roads and other public spaces.

The following activities are included in this policy:

- Planting
- Maintenance
- Protection during construction or earthworks
- Removal

This policy does not include trees located in the following areas:

- On private land
- On state highway land
- Public land not owned or looked after by us

Other areas which are not included in this policy:

Commented [DM1]: The term tree/trees is a defined term in the policy. The current definition does not cover all trees/vegetation that could impact on Orion’s underground or overhead network. Similarly, it does not align with the definition contained in the Electricity (Hazards from Trees) Regulations 2003. As a consequence, an amendment to the definition is proposed (page 8 of the policy (page 19 below in this version))

Commented [DM2]: Amendment to recognise the importance of the distribution network

Commented [DM3]: Self-seeded trees pose an issue the same as planted trees. It is requested that the policy is made clear the policies and provisions within apply to self-seeded trees. A related amendment to the definition on page 8 is also required.

- Native revegetation or regeneration
- Plantation forestry
- Riccarton Bush

Policy statement

The principle objective of this policy is to provide consistency and clarity in decision making when maintaining, planting, removing and working around trees.

1.0 Tree planting

Tree planting is an integral part of managing and developing trees on public land to achieve a long term sustainable canopy over the city. To achieve the appropriate canopy cover for the urban environment and to offset any canopy cover reduction an increase in planting numbers is required. Improving the quality of the tree canopy will be achieved through planting “the right tree in the right place”.

Policy:

- 1.1 We will actively seek new tree planting opportunities in suitable locations to maximise canopy cover and deliver ongoing environmental, economic and social benefits.
- 1.2 All projects we lead will prioritise the incorporation of new tree planting into their design. This may include but is not limited to installing new underground services outside of grass berms to allow sufficient rooting environment for new trees in consultation with the relevant network utility operator.
- 1.3 We will endeavour to plant the most appropriate tree species based on site suitability, aesthetic, functional and biological attributes, performance, longevity and the potential to contribute to landscape character.
- 1.4 In sites of ecological significance including non urban areas of Banks Peninsula, and the Port Hills, we will endeavour to strengthen and enhance existing indigenous biodiversity and ecological resilience by selecting native species provenanced to the local area or region for new tree planting except where other species are necessary for specified reasons.
- 1.5 Trees will be planted only in the road corridor reserve where the species selected has sufficient space to grow into mature and healthy specimens without causing significant damage to existing infrastructure. Trees will be planted near- under power lines only where the species selected is able to grow to maturity without encroaching into the relevant Notice zones as prescribed in the Electricity (Hazards from Trees) Regulations 2003. Trees will be planted near underground cables only where minimum clearances can be achieved or where suitable root barriers for the specific type of underground cable can be installed. requiring line clearance pruning that results in poor tree form or structure.
Note: Tree planting in road corridors should be carried out in accordance practice with the National Code

Commented [DM4]: Orion interprets this to mean new services, rather than relocating existing services. Orion would oppose policy that requires relocation

Commented [DM5]: Amendment to ensure that engagement with the utility owner occurs to in order to understand the cost and operational implications of the proposal.

Commented [DM6]: Amendment to ensure consistency with the term used elsewhere in the policy and as defined.

Commented [DM7]: Delete the word 'significant'. Orion cannot support a policy that anticipates damage to infrastructure. In addition, the term 'significant' is open to interpretation.

Commented [TS8]: <https://www.oriongroup.co.nz/safety/time-to-trim-your-trees/trimming-trees-near-power-lines/>

Commented [TS9]: Refer to Appendix 2

Commented [TS10]: Please refer to Appendix 3 of the submission which illustrates root damage.

Aside to the development of this Tree Policy, Orion wishes to separately engage with the appropriate persons at CCC to discuss suitable root barrier requirements as Orion's requirements differs to that of the CCC's in their Construction Standard Specification and Infrastructure Design Standard.

of Practice for Utility Operators' Access to Transport Corridors.
Requirements regarding clearances from power lines and underground cables can be advised by the network utility owner.

Commented [TS11]: Advice notes added

- 1.6 All trees will have a minimum establishment maintenance period of 24 months.
- 1.7 The owners of property located directly next to new or replacement tree planting may have input into the final positioning of the tree, but not as to whether a tree is to be planted outside their property.
- 1.8 The cost of planting and establishing street and park trees within new subdivisions will be covered by the developer for at least 24 months.

Tree replacement

We acknowledge that trees have a finite lifespan and may require removal for a number of different reasons. We are committed to ensuring that a tree renewal programme is maintained to ensure the canopy cover is not only replaced but is also increased for future generations.

In addition to Policies 1.1 – 1.8:

Commented [DM12]: Amendment to clarify that policies 1.1-1.8 apply here

Policy:

- 1.9 For every tree removed a minimum of two new trees ~~will~~ may be planted.
 - The canopy cover which is lost as a result of the removal will be replaced within 20 years through the planting of additional trees.
 - The location for the new tree will be based on the following:

Commented [DM13]: Amendment to remove prescriptive requirement. There may be circumstances where it is not possible to provide two trees, particularly in circumstances where the proposal may impact on network utility infrastructure or where amendments and/or alterations to the existing network would be required leading to cost implications and/or operational resilience impacts.

Road corridor removals

Commented [TS14]:
If this term is going to be used a reference should be included to its definition in the [National Code of Practice for Utility Operators' Access to Transport Corridors](#) (which includes a reference to 'Road' in section 315 of the LGA 1974) – page 11.

A new definition is proposed for the Definitions section

- (1) In the same road corridor where the tree was removed; or
- (2) If no further planting in the road corridor is required, then in the closest road corridor that requires either new or additional planting; or
- (3) Within the Urban Forest.

Removals outside of the road corridor such as reserves:

- (1) In the same reserve where the tree was removed; or
- (2) If no further planting in reserve is required, then in the closest road corridor or reserve that requires either new or additional planting; or
- (3) Within the Urban Forest.

Community planting

We support the community care and ongoing stewardship of public open spaces. Community planting is one way residents can become directly involved with the care of their local reserve. Community-initiated tree planting requires prior approval from the asset owner of the land (i.e. the specific Council unit) and the local community board. Information to be provided for approval should include the proposed site, planting locations, species, the perspective of surrounding neighbours and ongoing maintenance arrangements will be needed prior to approval being given. Policy:

- 1.10 We encourage community involvement and will endeavour to support and enhance community planting and engagement opportunities.

Note: This policy should be read in association with the Community Garden and Edible Tree Policies.

Commemorative trees

Commemorative tree planting is generally done to honour a particular person or for remembering an event. The type of tree and chosen location need to be appropriate for the person or event that it is commemorating. Commemorative planting should also contribute to the amenity of the location by ensuring the tree is healthy and complements the surrounding environment.

Policy:

- 1.11 We will consider requests for commemorative tree planting in public open space.
- 1.12 The species of trees used for commemorative tree planting may vary depending on the suitability of the site and any planting designs, plans, strategies and policies.
- 1.13 A minimum replacement period will be determined with the applicant prior to the tree planting. The tree will be replaced if it dies within this time period. Once the minimum replacement period has expired we will no longer be obligated to replace the tree.
- 1.14 While we will make every effort to retain a commemorative tree, we reserve the right to remove the tree for development purposes, or any other Council project. If this is done prior to the minimum replacement period we will plant a new commemorative tree in the closest available position and where possible with input from the applicant.

2.0 Maintenance of trees in public spaces

Tree maintenance

Trees provide a large range of benefits to both the city and their immediate surroundings such as cooling and filtering the air.

We will maintain our tree assets to maximise their benefits while minimising conflicts and disruptions.

Policy:

2.1 We will maintain tree canopy clearances of our trees over footpaths, cycle ways, carriageways, vehicle crossings and onstreet car parks where it is practical to do so. Where this is likely to cause long or short term detriment to the tree we will prune the tree only to the extent required for the interest of public safety.

2.2 We will ensure that compliance with relevant statutory requirements, including the Electricity (Hazards from Trees) Regulations 2003, is achieved by ensuring tree maintenance budgets have been appropriately quantified and an on-going proactive programme is developed and maintained in consultation with the network utility owner.

2.1

Commented [DM15]: New policy

2.3 We will prune existing trees (refer to Section 1.0 for new or replacement trees) to provide necessary clearances as prescribed by the Electricity (Hazards from Trees) Regulations 2003 to infrastructure such as power lines and to other overhead services. Where the tree is considered significant or of high value and pruning is likely to cause long or short term detriment to the tree's health and structure, we will engage with the network owner to explore alternative options to pruning such as the bundling of wires.

Commented [TS16]: Bundling of wires is not an engineering control Orion would use or accept so reference to this should be removed.

2.4 Where appropriate we will prune trees to improve public safety. This may include but is not limited to pruning to improve sightlines, or pruning for crime prevention purposes.

2.22.5 All pruning shall be undertaken by, or under the supervision of, a works arborist employed or contracted by us or a network utility operator.

2.32.6 We will not undertake full height reduction pruning to alleviate tree issues such as shading or debris, or the establishment, retention or enhancement of views.

2.42.7 We may consider other forms of pruning, branch removal or targeted canopy reductions, to alleviate boundary encroachment, for views, reduce shading or debris at the request of a resident, provided, in the opinion of a Council arborist, it does not negatively affect the health or structural integrity of the tree or the environmental, aesthetic, landscape or amenity benefits provided by the tree.

2.52.8 Where tree pruning has been approved by a Council arborist and the benefits of the pruning are considered to be solely beneficial to the property owner(s), we reserve the right to request the

resident(s) meet(s) the financial costs of pruning. We will provide the expected costs for the works for approval prior to any works being undertaken.

Tree risk

We acknowledge the risk posed to people and property through failure of the whole tree or individual branches. While the risk posed by trees is inherently low, we will use reasonable endeavours to ensure that tree risk is managed in a proportionate and practical way.

Policy:

2.62.9 We will maintain our trees to promote structurally sound growth and reduce branch and whole tree failure where it is likely to increase the risk to people, ~~and property~~ and infrastructure to an unacceptable risk.

Commented [DM17]: Amendments to include infrastructure

2.72.10 We will develop and adhere to a tree risk management procedure to manage the risk posed by trees in a proportionate and practical way. This will include the following:

- How to identify high risk trees;
- Details of different types of assessments;
- Frequency of assessments;
- How these trees will be managed;
- Engagement with the relevant network utility owner where a tree in close proximity to infrastructure poses an unacceptable risk.

Commented [DM18]: New policy item

2.82.11 We will develop and maintain a publicly available database on our tree assets.

2.92.12 The management of the risk posed by trees shall be prioritised over the amenity or historical value provided by the tree. The management of risk should include tree pruning and/or adapting the area surrounding the tree. Removal should only be considered as a last resort.

Ecological improvements

Trees provide a significant contribution to the ecological environment within the city by providing a habitat to a large number of living organisms. Without the services trees provide whether it be habitat or a food source many of these organisms would not be able to survive. We acknowledge the important role trees play in the natural environment and will strive to manage the trees in a way that will foster and enhance the environment for indigenous flora and fauna.

Policy:

2.102.13 We will actively encourage opportunities to provide habitat for indigenous flora and fauna.

2.112.14 We will promote the ecological benefits provided by trees through our tree maintenance programme.

3.0 Working around trees

Trees within the urban environment are often subjected to adverse conditions particularly during construction activity. It is important to manage works around trees to ensure they are not subjected to work practices that are detrimental to the health

or structural integrity of trees. Where this may occur we require a Tree Protection Management Plan (TPMP) to be developed by the person(s) undertaking/managing the works. This must be approved by us prior to work commencing.

Note: Works by utility operators around trees in road corridors are carried out in accordance with the National Code of Practice for Utility Operators' Access to Transport Corridors.

Note: Network utility owners may have statutory rights to maintain their infrastructure. Those rights are not superseded by the below policies.

Commented [DM19]: Explanatory notes added

Policy:

3.1 A Tree Protection Management Plan (TPMP) is to be submitted to us for any activity or work proposed near one of our trees where the works are likely to impact on the tree or its root zone.

3.13.2 TPMPs are to be developed by the person(s) undertaking/managing the works and be in accordance with the Christchurch City Council Construction Standard Specifications (CSS). We must approve a TPMP prior to work commencing.

3.23.3 Development projects on land we own and/or look after will prioritise the retention of mature trees through all aspects of the project.

3.33.4 We reserve the right to seek compensation and/or remediation for loss or damage to our trees and their immediate environment as a result of the works being carried out. Damage or loss will include but is not limited to:

- Death or decline of tree(s) health
- Physical damage to the tree(s)
- Damage to the tree(s) roots and/or rooting environment including compaction or contamination of the soil
- Loss of environmental and ecological benefits provided by the tree

We will determine the value through either the cost of replacement/repair of loss/damage or through an approved tree valuation method, whichever we deem to be most appropriate.

3.5 Works near trees must comply with relevant statutory requirements, regulations

and relevant codes of practice. For works near power lines this includes WorkSafe's Approved Code of Practice: Maintenance of trees around power lines and the New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001.

Note: Compliance with Christchurch District Plan tree rules for works within the vicinity of trees will be required. This may mean in some instances a resource consent will be required, for example works within 5m of the base of trees on our land where not exempt¹.

Commented [TS20]:
New policy

Commented [TS21]:
Certain activities may be exempt as per District Plan

Tree value

In order for trees to be acknowledged for the value which they provide to the city we need to have a valuation system in place.

Policy:

~~3.43.5~~ We will implement and adapt (if required) a recognised system for valuing our trees.

4.0 Removal of trees

Like all living things, trees grow, age and eventually die. Tree removal is a last resort option. However, where a tree is in a state of irreversible decline or is a public health and safety risk, sometimes tree removal is the only option. Selective tree removal and replacement programmes are vital in managing our trees to ensure that the numerous benefits trees provide are sustained for future generations.

Policy:

~~4.1~~ Trees in a state of irreversible decline, dead and/or structurally unsound may be removed as part of routine maintenance and renewal programmes or sooner if urgent action is required for public safety or to avoid damage to property.

~~4.14.2~~ Trees that are unhealthy, dead and/or structurally unsound may be retained for ecological purposes if they do not pose an unacceptable risk to the public or property. This must be established through a Council-approved risk assessment methodology.

~~4.24.3~~ Tree removal will be considered where the tree is causing, or likely to cause, ~~significant~~ damage to buildings, services or property (both public or privately owned) and the damage cannot be reasonably rectified or mitigated except by removing the tree.

~~4.34.4~~ Trees that are posing an unacceptable safety risk to the public and cannot be mitigated through pruning or other engineering solutions will be removed.

~~4.44.5~~ Trees that are impeding consented legal access will be removed only when all other alternatives have been explored and are not viable.

~~4.54.6~~ Healthy and structurally sound trees may be removed to manage or prevent the spread of pests and diseases, this includes the removal of pest trees where they are deemed a threat to indigenous flora and fauna.

~~4.7~~ Wilding trees will be removed where they are considered to be a threat as a pest species or cause a nuisance in a particular location.

~~4.8~~ A tree may be removed if the tree is located in the Christchurch Botanic Gardens and felling is required in order to protect or enhance botanical collections or reduce species duplication in accordance with the provisions of the Christchurch Botanic Gardens Management Plan.

Commented [DM22]: Delete "significant", as per comments on policy 1.5

4.94.9 A tree may be removed if the removal is in accordance with the provisions of a reserve management plan for the reserve where the tree is situated or the provisions of a management plan for the open space where the tree is situated (such as a park).

4.10 A tree may be removed where felling of the tree is required to comply with rules within the district plan for Christchurch International Airport's protection surfaces or the Defence Wigram protection surfaces.

4.11 Tree removal will be considered where a tree is encroaching into the prescribed clearance distances to a power line as set out in the Electricity (Hazards from Trees) Regulations 2003 and a reasonable alternative to removal with the network utility owner cannot be reached.

Commented [DM23]: New policy inserted

4.94.12 Tree removals must be undertaken by, or under the supervision of, a works arborist employed or contracted by us or a network utility operator.

4.104.13 We *will not* remove trees for the following reasons unless approved under sections 4.16-4.18 of this policy:

- There is a safe and practical means for tree retention.
- To minimise obstruction of views or commercial signage.
- To reduce leaf or fruit litter and other debris.
- To reduce shading.
- For contributing to allergenic or irritant responses unless approved under section 4.16.

Note: This policy should be read in conjunction with the Christchurch District Plan, as resource consents may need to be obtained prior to any removal being undertaken eg for removal of trees of particular species or in certain areas

Note: Implementation of these policies should include consultation with the relevant network utility owner.

Commented [DM24]: New advisory note

4.114.14 Tree removal will be considered where the tree is causing, or likely to cause, significant damage to buildings, services or property (both public or privately owned) and the damage cannot be reasonably rectified or mitigated except by removing the tree.

4.15 Trees that are posing an unacceptable safety risk to the public and cannot be mitigated through pruning or other engineering solutions will be removed.

4.124.16 Trees that are impeding consented legal access will be removed only when all other alternatives have been explored and are not viable.

4.134.17 Healthy and structurally sound trees may be removed to manage or prevent the spread of pests and diseases, this includes the removal of pest trees where they are deemed a threat to indigenous flora and fauna.

Public requests for tree removal

We often receive requests for trees to be removed from public spaces. Tree removal requests will be processed under the following criteria:

Policy:

4.144.18 We will assess the request against the criteria listed above (4.1 to 4.5). Should the request meet any of the criteria the tree may be removed as part of routine maintenance or sooner².

4.154.19 If the tree does not meet the criteria of 4.13 above, we will work with the applicant to seek alternative resolutions to removal for example targeted pruning.

²The removal of a tree under policy statement 4.5 (tree's impeding legal access to road) will be undertaken as required to allow access to the road to be established. This is likely to be sooner than the routine maintenance cycle.

4.164.20 If no alternative resolution is acceptable then the person requesting the removal of the tree will need to submit an application to us for the relevant community board or reserve management committee to consider. This must be accompanied by a tree report prepared by a technician arborist and include any other relevant information pertaining to the application. If a resource consent is required, this must also be obtained prior to any application being submitted to the community board. All reporting and consents must be provided by the applicant at the applicant's cost.

4.174.21 Requests for removal of tree(s) will be considered for health reasons where there is confirmation from either the applicant(s) medical practitioner, a clinical immunologist or the medical officer of health confirming that the tree(s) is/are the sole cause of the applicant(s) condition and that removal of the tree(s) is the sole option available for improving the applicant(s) condition.

4.184.22 Requests for removal of tree(s) that are causing property damage will be considered where the damage is confirmed to be a direct result of the tree and where no alternative measures (including engineering solutions) can be used to mitigate the problem.

4.194.23 Requests for removal of tree(s) due to other issues will only be approved under exceptional circumstances and will be required to meet all of the criteria below:

- The issue caused by the tree has a significant effect on the applicants day to day living; and
- The tree is the sole cause of the issue; and
- The issue is not able to be mitigated through general maintenance by the property owner e.g. clearing gutters of leaves; and
- No pruning intervention can be undertaken which will mitigate the issue caused by the tree; and
- No reasonable engineering solution can mitigate the issue caused by the tree

Cost of removal of trees in public spaces

The removal of trees can result in a considerable cost. In some instances it may be considered appropriate for these costs to be recovered.

Policy:

4.204.24 Where the removal of a tree is requested and the tree can be removed in accordance with policy 4.13 and is permitted by the district plan rules then we will undertake the removal as part of the routine maintenance and renewal programmes.

4.214.25 Where the tree removal request does not meet the criteria of 4.13 but is approved by the relevant community board or reserve management committee, the board may resolve that the applicant pay part/all of the costs including the application fee (as per Council's Fees and Charges Schedule):

- Any additional costs associated with reporting on the tree removal application
- Any resource consent costs (if required)
- Actual cost of tree removal and replacement
- The value of the environmental, economic and social services provided to the city by the tree (as determined by our approved tree valuation method)

Definitions

| | Term | Definition |
|--|--|--|
| | Actual costs for removal and replacement | The cost incurred by the Council to remove the tree(s) and stump(s), purchasing and planting of a replacement tree(s) including 2 years establishment maintenance for the tree(s). |
| | Best industry practice | For example but not limited to the British Standard 3998:2010 'British Standard Recommendations for Tree Work' and Australian Standard 4373 1996 Pruning of Amenity Trees. |
| | Canopy cover | The area taken up by the tree canopy. |
| | Commemorative trees | Includes memorial and sponsored trees. |
| | Construction Standard Specifications (CCC CSS) | Is a set of guidelines determining the standards required for the creation or enhancement of infrastructure assets either owned or to be owned by Council. Includes provisions for the protection and planting of trees. |
| | Council/we/our/us | Means the Christchurch City Council or its authorised delegate. |
| | Establishment maintenance period | Establishment maintenance shall include but not be limited to watering, weed control, application of mulch (where required), and installation and removal of support systems. All maintenance should be compliant with the relevant sections of the 'Christchurch City Council Civil Engineering Construction Standard Specification' (CSS). |
| | Full height reduction | A method of pruning which results in the removal of the upper canopy to reduce the overall height of the tree (otherwise referred to as topping). |
| | Inappropriate species | Tree species listed in Infrastructure Design Standards (IDS) Part 10: Reserves, Streetscape and Open Spaces (the IDS is online and any amendments are automatically included). |
| | Infrastructure Design Standards (IDS) inappropriate species | A set of guidelines determining the principles behind and the minimum standards required for the creation or enhancement of infrastructure assets either owned or to be owned by Council. Tree species listed in Infrastructure Design Standards (IDS) Part 10: Reserves, Streetscape and Open Spaces (the IDS is online and any amendments are automatically included). |
| | Irreversible | The decline of a tree's health which is to such an extent |

| | |
|---|---|
| decline | that it is unlikely to recover. |
| Mature | A tree reaching its ultimate potential size, whose growth rate is slowing down, with limited potential for any significant increase in size. |
| Native revegetation or regeneration | An area of native New Zealand plants which have been planted to form a closed canopy. This may be directly planted or naturally occur from a nearby seed source. |
| Plantation forestry | Means the use of land and buildings for planting, maintenance and harvesting of timber tree species for commercial wood production. |
| Pest tree | A parent tree from which seed disperses to create a “wilding tree” which causes major change to composition, structure and functioning of adjacent indigenous habitat. |
| Provide habitat for indigenous flora and fauna | This could be achieved by allowing dead trees to remain or keeping trees with cavities. The retention of dead wood and stubs could also be seen as providing habitat for indigenous flora and fauna. |

| | |
|---|---|
| Public open space | Means any open space, including roads, parks and reserves, accessible to the public either freely or in accordance with a charge under the Reserves Act 1977. |
| Qualified arborist | A person who has a recognised arboricultural qualification (minimum of NZQA Level 4 Certificate in Arboriculture or similar), industry experience and is competent to carry out a specified task. |
| Risk | The combination of the probability of an event and its consequence (ISO 2009). |
| Road corridor | As defined in the current version of the National Code of Practice for Utility Operators Access to the Transport Corridors |
| Sites of ecological significance | Sites identified within the district plan (Appendix 9.1.6.1) as areas of ecological significance. |
| Structurally unsound | The trees structure has been compromised to a level which is likely to fail during normal weather conditions. |
| Targeted canopy reduction | The targeted pruning of selected branches within the tree canopy to shorten their length. |

Commented [DM25]: New definition, as per comment on policy 1.9

| | |
|--|--|
| Technician arborist | <p>Means a person who:</p> <ul style="list-style-type: none">) by possession of a recognised arboricultural degree or diploma and on the job experience, is familiar with the tasks, equipment and hazards involved in arboricultural operations; and) has demonstrated proficiency in tree inspection and evaluating and treating hazardous trees; and) has demonstrated competency to Level 6 NZQA Diploma in Arboriculture standard (or be of an equivalent arboricultural standard). |
| Tree | <p>A single woody plant with the potential to reach at least 5 metres in height and have a stem diameter of, or exceeding, 150mm measured at 1.4 metres above ground.</p> <p><i>There are certain species, which could include fruit, nut and endemic species, which may not always fit within the definition of a tree. In these situations the decision as to whether or not to include the species, or individual tree, as a tree will be determined by a Council arborist.</i></p> <p><i>Assets that are currently recorded as trees but do not fit the definition of a Tree will continue to be managed as a Tree throughout their life cycle until they are replaced.</i></p> <p><u>The term tree includes:</u></p> <p><u>all trees within council owned land – whether they are planted or self-seeded or planted; and</u></p> <p><u>all vegetation that may adversely impact on Orion’s overhead or underground distribution network irrespective of height.</u></p> |
| Tree Protection Management Plan | <p>Where it is not possible to complete the works without encroaching within the Tree Protection Zone, a proposed methodology in the form of a Tree Management Plan shall be produced by a technician arborist as per the specifications within the relevant sections of the CSS.</p> |
| Value of a tree | <p>A monetary value determined by a council recognised system such as the Standard Tree Evaluation Method 1996 (STEM).</p> |
| Wilding tree | <p>A self-sown tree growing wild or escaped from cultivation and growing wild and not planted for any specific purpose.</p> |
| Works arborist | <p>Means a person who:</p> <ul style="list-style-type: none"> a) by possession of a recognised arboricultural degree, diploma or certificate and on the job experience, is familiar with the tasks, equipment and hazards involved in arboricultural operations; and b) has demonstrated competency to Level 4 NZQA Certificate in |

Commented [TS26]:
Addition to definition, as discussed in the Introduction section on page 4 above

The term tree/trees is a defined term in the policy. The current definition does not cover all trees/vegetation that could impact on Orion’s underground or overhead network. Similarly, it does not align with the definition contained in the Electricity (Hazards from Trees) Regulations 2003. As a consequence, an amendment to the definition is proposed.

| | |
|--------------------------|--|
| | Horticulture Services (Arboriculture) standard (or be of an equivalent arboricultural standard). |
| Urban forest | Urban forest is a forest, or the collection of trees, that grow within a city, town or urban environment. |
| Unacceptable risk | A level of risk determined through a recognised council approved method (e.g. Quantified Tree Risk Assessment (QTRA) or Tree Risk Assessment Qualification (TRAQ)) which is elevated beyond what the Council considers acceptable. |

Notice and Growth limit zones



| Power line voltage | A. Growth limit zone | B. Notice zone |
|--------------------|----------------------|----------------|
| 66,000 volts | 4.0m | 5.0m |
| 33,000 volts | 2.5m | 3.5m |
| 11,000 volts | 1.6m | 2.6m |
| 400/230 volts | 0.5m | 1.5m |

For further information refer to the Electricity (Hazards from Trees) Regulations 2003 and Orion's website:
<https://www.oriongroup.co.nz/safety/time-to-trim-your-trees/>

Images 1 and 2 below illustrates roots crushing an electrical cable which causes failure of the cable.

Image 1



Image 2



Submission on Draft Tree Policy

1. We support the Council actively seeking new tree planting opportunities in suitable locations to increase canopy cover and deliver ongoing environmental, economic and social benefits.
2. We agree the role of trees in sequestering carbon is particularly relevant, as we are in a climate emergency, which Christchurch City Council itself declared in 2019. Increasing tree cover over Christchurch will also support the CCC Climate Smart Strategy and Resource Efficiency and Greenhouse Gas Emission Policy.
3. We note the draft policy states what the Council will do but there are no set targets and timelines, and monitoring and reporting back on policy progress is missing.
4. We are very supportive of community involvement in care and ongoing stewardship of public open spaces.
5. We would like to see more ecologically appropriate native trees planted, for their aesthetics and to provide more corridors and habitat for native fauna.
6. We would like to see more tree crops planted for community food foraging. Every autumn we see how popular the sweet chestnut trees and walnut trees near us are; there are people out gathering nuts every day.

Action sought:

- Add into the draft policy set targets and timelines, including monitoring and reporting back on policy progress to increase the tree canopy.
- Increase the tree canopy over Christchurch.
- Plant ecologically appropriate native species as much as possible as they bring the native fauna back into Christchurch.
- Also plant more tree crops of fruit and nuts to provide increased commons foraging areas across the Christchurch communities.
- Keep supporting community involvement in care and ongoing stewardship of public open spaces.



STEM GIRDLING ROOTS

THE UNDERGROUND EPIDEMIC KILLING OUR TREES

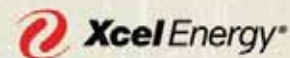
BY:
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UNIVERSITY
OF MINNESOTA



USDA Forest Service
Northeastern Area



STEM GIRDLING ROOTS

THE UNDERGROUND EPIDEMIC KILLING OUR TREES

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INTRODUCTION

30 YEARS IS NOT AN OLD TREE!

How many trees die prematurely each year? Thousands? Millions? Billions? It's almost impossible to pinpoint, but one unseen culprit – dysfunctional (abnormal) root systems – is responsible for an inordinate number of tree failures. It is estimated that one-third to one-half of tree losses during windstorms may be attributed to distorted and dysfunctional roots (University of Minnesota data, 1995-2005). [photo.1](#)

But not all premature tree loss is sudden. Shortened lifespans, sometimes as little as 20% of a normal lifespan, may be directly related to poor root systems and planting practices. Trees that are ugly above ground are usually uglier below ground. [photo.2](#)

NORMAL VERSUS ABNORMAL

A normal root system grows away from a tree's stem, similar to the spokes on a bicycle wheel. As the root grows out, the tree becomes stronger and healthier and develops a flare (the area where the stem and root merge). [photo.3](#)

Some roots become dysfunctional because they were forced to grow in a too-small container for a too-long time. These are referred to as “pot-bound” plants and represent one of the most common dysfunctional root systems. [photo.4](#) Often, pot-bound plants never develop a normal root system or normal life, even after they are planted in a landscape.

WHAT ARE STEM GIRDLING ROOTS (SGRs)?

A stem girdling root is a type of dysfunctional root that is growing against a tree's stem (the trunk), squeezing or compressing the sapwood. This happens as the root and stem grow radially (enlarge in diameter) and eventually this compression may severely retard or stop the flow of water, nutrients and sap (photosynthates, a.k.a., “food”), both to and from the roots. [photos.5 & 6](#)

photo.1



photo.2



photo.3



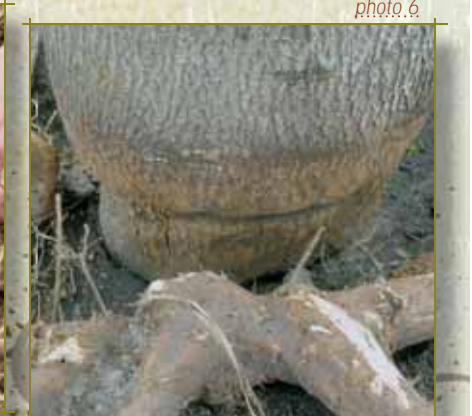
photo.4



photo.5



photo.6



Sometimes the stem is so weakened from this compression or “girdling” that trees snap off at this weak point during wind storms, a dramatic and preventable end. [photo.7](#)

photo.7



ARE SGRS A PROBLEM?

Indeed, SGRs can create problems in three ways, including safety issues, economic losses, and/or a decline in tree health (vitality).

SAFETY

Trees weakened by SGRs may present significant issues of safety. They often have smaller root systems or root systems that are poorly anchored in the soil, leaving them susceptible to wind-throw (uprooting during storms). If these trees are close to homes, sidewalks or utilities, they become a hidden and unacceptably high safety risk. [photo.8](#)

The compression of the sapwood tissue often causes branch die back in the tree's canopy. Depending on the size of the dead branches and their height in the tree, they too can cause injury or property damage when they fall.

ECONOMIC LOSSES

The presence of high risk trees in any landscape becomes an issue of economics. As the symptoms of SGRs become apparent more frequent inspections, care and pruning of the trees are needed.

Economic losses can be considerable for the property owner forced to remove, clean up and replace toppled or sick trees. [photo.9](#) Because SGRs often take years to affect a tree enough to cause it to fail – and by then that tree may be 30 feet tall or more – removals can be expensive. Of course, the losses incurred when trees fall onto buildings, vehicles or into utility lines can be substantial.

There are other costs associated with premature or sudden failures, especially during storms. Streets may be blocked, utility services interrupted and temporary shelter may be necessary until repairs can be made.

photo.8



photo.9



HEALTH

SGRs can reduce the relative health (vitality) of affected trees. Trees that are in poor health are more susceptible to secondary problems such as seasonal drought, diseases, insect pests and winter damage. Sometimes this leads to the loss of the beauty of the tree, sometimes to its death.

Trees with poor vitality are far less valuable to the landscape and often require increased maintenance, whether they are in a park or a residential lawn. Stressed trees require more disease and insect control treatments, more irrigation and sometimes more fertilization. Even then they still may be less aesthetically desirable than a healthy tree, as is the middle tree in [photo.10](#).

EMOTIONAL LOSSES

To many homeowners the greatest losses are emotional. Large trees cannot be easily replaced and it may take many years before the landscape is fully restored.

WHAT DO SGRS LOOK LIKE?

Three types of girdling roots may be present when a tree develops SGRs. The first is tangential girdling, which is a root that only compresses one side of the stem by growing against it. [photo.11](#) These are usually the more treatable situations, especially when the problem is detected early.

The second and most damaging type is layered girdling of the stem. [photo.12](#) This occurs when roots are in a sense stacked against the stem at different depths, and often on different sides. The deeper a tree is planted, the more likely this will happen.

The third type is a complete encircling of the stem by, most commonly, two or more girdling roots. [photo.13](#)



photo.10



photo.11



photo.12



photo.13

DIAGNOSIS: ABOVE GROUND SYMPTOMS OF THE PROBLEM

Often, SGRs are only one factor affecting a tree's health. Depending on the extent of sapwood compression, trees may be weakened to the point where other diseases, insects and weather cause further damage to the tree.

SGR "health decline" symptoms are usually slow to develop and may be barely noticeable to the untrained eye. As sapwood becomes more compressed with age, symptoms may occur singly or in combinations. They may not be as obvious every year, nor occur in any particular order.

Early recognition of these symptoms may give you enough time to determine how bad the problem is, develop a treatment plan and hopefully, save the tree.

WHAT TO LOOK FOR IN THE LEAVES:

- * Unusual leaf color
- * Unusual leaf size
(smaller than normal leaf in the middle in [photo.14](#))
- * Scorched leaves
- * Early or unusual leaf drop [photo.15](#).

WHAT TO LOOK FOR IN THE CANOPY

(all branches and leaves)

- * Early autumn color [photo.16](#).
- * Dieback (death of 1-2 feet of branch ends)
- * Thinning canopy density [photo.17](#).
- * Stagheading (death of a major branch/leader)

[photo.14](#)



[photo.15](#)



[photo.16](#)



[photo.17](#)



WHAT TO LOOK FOR IN THE STEM

(the stem is all portions below the first set of branches to the ground)

- * Leaning stems
- * Lack of characteristic stem taper
(stems look like utility poles at the ground line) [photo.18](#)
- * Cracking of the stem or bark [photo.19](#)
- * Secondary invaders
(especially wood boring insects or fungal cankers)

HOW DO SGRS FORM?

Most stem girdling roots are formed as the result of cultural or planting practices. When main branch roots are cut for any reason (transplanting, excavation for a sidewalk), new roots often form that run tangential (along one side) to the stem, rather than out and away like a normal branch root would. Container-grown trees with encircling roots (a.k.a., pot-bound) often force roots into positions that may eventually cause compression of the sapwood in the stem. [photo.20](#).

Planting too deep or piling mulch up against stems often encourages adventitious (roots growing out from the stem tissue) to grow in a direction that within a few years causes compression in the stem.

If tree stems are completely above ground, then SGRs are not likely to form. However, ANY practice that places stems below ground (or below mulch as in [photo.21](#)) puts the tree at-risk for developing stem girdling roots.

Trees that have been planted too deep in containers or dug with excess soil over the root system (often hidden by the burlap around the soil ball) are automatically set up for failure if the excess soil over the roots is not removed at planting time.



In [photo.22](#), more than 12 inches of excess soil was found over the roots of this hackberry by probing through the burlap with a stiff wire.

There is evidence that at least one tree species (Norway maple) may be genetically prone to the chronic formation of stem girdling roots. There is also an increasing amount of evidence that SGR problems are not just limited to Norway maples. Ashes, lindens, other maples, crabapples and hackberrys are all common victims of this problem. SGRs have been reported on at least 56 different trees in North America.

ROOT COLLAR INSPECTIONS

Recognizing the above-ground symptoms of SGRs is only a clue that there may be below-ground problems. The final diagnostic step should involve a root collar (that area where the stem widens to the first branch roots) inspection to confirm whether or not SGRs are present and the extent of stem compression.

In most cases, a root collar inspection is done in a fairly small area around the tree's stem: excavating 6-12" out from the stem and 4-12" deep. This excavation should be done carefully, preventing the damage to the root system as much as possible.

Inspections may be performed with a small, stout, metal trowel for smaller trees, or with a wet/dry vacuum for larger excavations. The vacuum method is particularly time efficient. In [photo.23](#), this excavation was done in a few minutes with a trowel and wet/dry vacuum with no damage to the roots.

With drier, looser soils, loosen the soil with a trowel and vacuum the loosened soil away. If the soil is particularly hard, soak it thoroughly before and during the vacuuming process. Use a grounded, high quality wet/dry vacuum.

Some tree companies have specialized equipment for non-destructively removing soil over root systems. This equipment uses pressured air to displace the soil without damaging the roots. [photo.24](#)



photo.22



photo.23



photo.24

If stem girdling roots are found, they may be removed if the compression is not too severe (less than 1/2 of the stem circumference compressed). In [photo.25](#), the white-painted roots could easily be removed after the excavation, preventing any further injury to the tree. If removal of the girdling root would involve severe wounding of the stem, it is not recommended that the root be removed. Instead, cut both ends of the root where it comes in contact with the stem in order to stop its growth.

In [photo.26](#), the girdling root was removed without wounding the stem, even though the root had caused some compression to the stem.

DO NOT replace the excavated soil and bury the stem again. Cover the exposed roots with a light application of mulch (2-4"), taking care not to pile the mulch against the stem of the tree.



photo.25

PREVENTION = TREATMENT = RECOVERY

PREVENTION

PREVENTION of stem girdling roots is the most effective method of reducing the loss of trees to this problem.

1. DO NOT plant trees too deep. The first true branch roots should be at or barely below the soil surface. Refer back to [photo.3](#) on page 5 for an example of where to look for the first true branch root.
2. Inspect ALL containerized and balled-and-burlapped trees for the depth to the first branch roots and assume that most trees are buried too deep in their soil balls. A stiff wire may be used to probe down from the surface to locate those roots, as was done with the tree in [photo.22](#) on page 15.

If the roots are 4" down from the top of the burlap or container surface, dig the planting hole 4" shallow so the first roots are level with the ground line, as shown in [photo.27](#).



photo.26



photo.27

After the tree has been placed in the planting hole and partially back-filled, scrape the excess soil off the surface of the root/soil mass until the first branch roots are exposed.

If you are planting containerized trees, the process is a little simpler. With a probe, determine the approximate depth to the first main roots. Then, use an old pruning saw to remove the excess soil and roots as in [photo.28](#).

In [photo.29](#) the excess soil has been removed (about a 2-3 minute process) and the tree is ready for planting. DO NOT WORRY that you have harmed the tree. On the contrary, you have saved it!

3. Inspect tree root systems for adventitious roots that may be growing against the stem. These roots should be removed prior to planting. Trees with severely pot-bound roots (roots the size of a pencil or larger) should be avoided. They are not likely to ever become normal, healthy root systems.
4. DO NOT pile mulch against the stem of the tree. It's the same as planting too deep.
5. Periodically monitor the stems of your trees. Randomly inspect them with root collar excavations for early signs of the formation of encircling or tangentially placed roots.

TREATMENT

Compared to prevention, there are few choices for treating trees with stem compression from girdling roots: The reality is that prevention is much more effective and successful than treatment of SGRs.

If the roots are not yet contacting the stem, simply prune out the roots before they have the chance to cause compression. In [photo.30](#) there are three roots that could cause stem girdling problems. Removing them now at inspection time with a pruner or saw will prevent those future problems.

photo.28



photo.29



photo.30



If stem compression has already occurred, there is often not much that can be done, depending on the severity of the compression. The tree may live for a long time with the girdling root imbedded in the stem.

Removing the girdling root may involve the removal of an extensive branch root and the fine root system and the decline in health could actually be accelerated. If the removal or pruning of SGRs requires more than hand tools, you should seek professional advice before attempting any treatments to the trees.

RECOVERY

Often if compression is severe the only recourse is some treatment and intensive care. Since not all trees with stem girdling roots die young or fail during windstorms, keeping the trees healthy may help them recover or tolerate the stress.

1. Never let them become moisture stressed. Water deep and over the entire root system. Use mulches to retain the soil moisture and reduce competition from turfgrass roots, but don't pile the mulch up against the trunk.
2. If the tree has become nutrient stressed and is growing less than typical for the species and the site, light additions of slow-release nitrogen fertilizers may help. However, do not fertilize so much that excessive above-ground growth further burdens the weakened stem and root system.
3. Stressed trees are more vulnerable to insect and disease problems. All measures to reduce the additional stresses from insect damage and diseases should be taken. Contact a tree care professional to determine if there are any secondary problems developing.
4. Anticipate several years of reduced growth and branch die-back during the recovery process. Regular (every 2-3 years) deadwood removal pruning may be required to reduce risks from branch failures during the recovery period.

You are encouraged to contact a professional for advice or assistance during any stage of the prevention, treatment, or care of SGR-affected trees. Local nurseries are a good starting point. International Society of Arboriculture (ISA)-certified arborists can be found at www.treesaregood.com.

ADDITIONAL PRINT/WEB RESOURCES:

Arboriculture: Integrated Management of Landscape Trees, Shrubs and Vines, by Richard Harris, James Clark and Nelda Matheny. Prentice Hall.

A Practitioner's Guide to Stem Girdling Roots, by Richard Hauer and Gary R. Johnson, a U.S. Forest Service publication.

The University of Minnesota, Department of Forest Resources Extension and Outreach web site: www.fr.cfans.umn.edu/extension. Access the Urban and Community Forestry folder and proceed to Stem Girdling Roots.

PHOTOGRAPHY CREDITS:

Photos 5, 18, 20, 24 and 27 are courtesy of Eric Berg, Community Forestry Program Leader, Nebraska Forest Service.

Photo 9 courtesy of Gary Wyatt, University of Minnesota Extension Service

Photo 6 was provided by the University of Minnesota, Facilities Management Department.

All other photos by Gary Johnson, University of Minnesota.

GLOSSARY

- Adventitious Root** *A root growing in an unusual place, e.g., the stem. Rooted cuttings depend on adventitious roots.*
- First True Branch Root** . . . *The uppermost branch root that is large enough to be considered a permanent root. On a nursery-grown tree, this will be at least as big in diameter as a pencil, and often as large as a carrot. Don't confuse this with a smaller, adventitious root that could have formed from soil or mulch piled against the stem.*
- Sapwood** *A tree's stem is either wood or bark. Wood may be either sapwood or heartwood. Sapwood is the lighter colored wood closest to the bark, and is the wood that moves "sap" throughout the tree.*
- Stem Encircling Root** (SER) *A root that grows next to or around a buried stem. In time, SERs can enlarge, begin compressing stem tissue and become Stem Girdling Roots.*
- Stress** *Any disruption of normal health. Stress is normal and plants usually recover if their overall health is adequate. Leaf loss due to hail storms, roots exposed to flooding and deicing salt spray on pine needles are all examples of common stresses to trees.*
- Symptom** *A plant's reaction to a problem that is affecting its health. For instance, wilting, browning of needles (in evergreens) and stunted growth.*





**HELP YOUR TREES
LIVE LONG
HEALTHY LIVES**

- 1. DO NOT PLANT TOO DEEP.**
- 2. INSPECT ALL TREES AND SHRUBS BEFORE YOU BUY. FIRST ROOTS SHOULD BE NEAR THE SURFACE.**
- 3. AVOID BUYING TREES THAT ARE SEVERELY POT-BOUND AND BURIED TOO DEEP IN CONTAINERS.**
- 4. DO NOT PILE MULCH AGAINST STEMS.**
- 5. PERIODICALLY CHECK YOUR TREES FOR PROBLEMS. INTERVENE EARLY.**

See Pages 16-20 for more detailed instructions on preventing Stem Girdling Roots, and for additional tips on the treatment and recovery for trees already afflicted with SGRs.

Draft Tree Policy 2020 Submission

Date: 8 October 2020
To: Christchurch City Council
From: Waimāero/Fendalton-Waimairi-Harewood Community Board
Contact: David Cartwright
Chairperson
C/- PO Box 73020
Christchurch 8154
Phone: [REDACTED]
Email: [REDACTED]

Introduction

1. The Waimāero/Fendalton-Waimairi-Harewood Community Board ('the Board') appreciates the opportunity to submit on the Christchurch City Council's Draft Tree Policy 2020.
2. The Board does wish to be heard in support of its submission.

Comments

3. For many years the Board has advocated for a comprehensive policy, that sets out clearly, the processes around the planting, maintenance and removal of trees on Council-owned land.

The Board is very pleased that a draft Tree Policy is now available for community comment and would like to take this opportunity to acknowledge the work of staff and previous elected members who, over the years, have contributed to the development of the draft policy.

4. Introduction

The Fendalton-Waimairi-Harewood Community Board is fortunate to have a large number of established trees in its streets, parks and reserves and it appreciates the immense amenity value that these trees have aesthetically, for shade, for stormwater management and in reducing our carbon footprint.

At times however, these trees create issues for the neighbouring residents and it is imperative that there is sound policy that the residents of Christchurch, the Community Board and Council staff can refer to, when considering the options available for Council-owned trees.

5. Draft Tree Policy 2020

The Board supports, in general, the direction of the Draft Tree Policy 2020 (draft Policy) but makes the following recommendations:

Tree Planting

- 5.1 The Board fully supports the draft Policy's proposals in relation to the planting of trees on Council owned land, but believes that to compliment the draft Policy, a high level report be developed that lists:

- the city's tree by species showing their location and ages
- where in the city trees have been removed
- the ongoing city-wide planting plan.

It is recommended that this information be publicly accessible on the Council website alongside the Tree Policy.

- 5.2 In addition to 5.1 above, the Board would also encourage the Council to make readily available information and/or links to information that promotes the benefit of trees in reducing climate change. This information will not only help inform but also add support to the Tree Policy.

Tree Replacement

- 5.3 The Board fully supports the proposals under the Tree Replacement section of the draft Policy, in particular the intent to plant two trees for every tree that is removed, noting that in many cases the replanting may need to occur within the Urban Forest, and prioritising the retention of mature trees for development projects on Council land.
- 5.4 The Board would further recommend that:
 - 5.4.1 Trees removed from the street corridor are replaced with the most appropriate species, in as close proximity to the original tree as possible, and that the adjacent resident be included in the species consideration.
 - 5.4.2 The Council undertake a proactive approach for the replacement of mature trees that includes an understanding the lifespan of the tree species and an associated planting plan to ensure that the amenity of such a tree is not lost when removal occurs (for example in Hagley Park). This particularly relates to heritage trees located across the city. The Board is of the opinion that this information could also be publicly available.
 - 5.4.3 That the value of the city's tree heritage is acknowledged and retained at the time of tree replacement. For example, Oak trees feature strongly in the city's heritage and, where appropriate, they should be included in the consideration of a replacement species.
- 5.5 The Board also supports the need for a Tree Protection Management Plan to be submitted to the Council before any activity near a Council-owned tree can be under-taken, and strongly recommends that infrastructure on city streets be installed through the footpath rather than the berm to ensure there is available space for the planting/retention of street trees. The Board considers that this should happen as a matter of course in those streets with affiliations to trees, for example, through the street name or the location.

Removal of Trees

- 5.6 The Board is comfortable with the processes contained in 4.1 to 4.12 of the draft Policy regarding the Council's removal of public realm trees, but would also suggest that under item 4.12 mention be made that where a property has been knowingly purchased adjacent to a Council-owned tree(s) any removal would be for proven damage issues only.
- 5.7 Over the years the Board has received many requests for the removal of trees due to health reasons. It agrees with the proposals under 4.16 of the draft Policy saying that confirmation from either the applicant's medical practitioner, a clinical immunologist or the medical officer of health be required confirming that the tree(s) is/are the sole cause of the applicant(s) condition, but would recommend that the last line be amended to read '... and that removal of the trees(s) is the most *logical* solution available for improving the applicant's condition.'

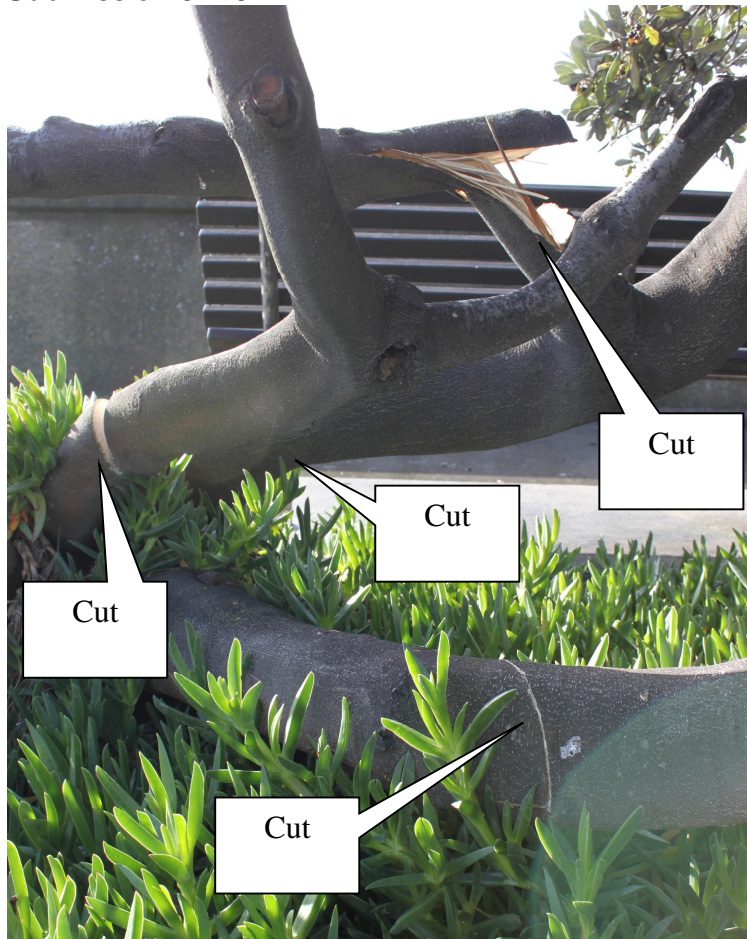
- 5.8 Where the draft Policy refers to Public Requests for Tree Removal, it is strongly recommended that a detailed flowchart be included to provide a visual guide on the process for applying for the removal of a Council-owned tree. This could also include how to request for the removal of excessive leaf and tree debris on residential properties from an adjacent Council-owned tree.
- 5.9 The Board is also concerned that the policy does not give sufficient clarity or guidance on apportioning the payment of costs associated with publicly requested tree removals. The Board would like to see a set of guidelines that set out how the fee and cost structure can be consistently applied across the city.

6. Conclusion

In conclusion, the Board is very supportive of the proposed Draft Tree Policy 2020 and considers that with the recommendations made in this submission, there will be clarity for Community Boards, Council Staff and the residents of Christchurch on how Council-owned trees are managed in our city.

A handwritten signature in black ink, appearing to read 'David Cartwright', with a stylized flourish at the end.

David Cartwright
Chairperson
Waimāero/Fendalton-Waimairi-Harewood Community Board



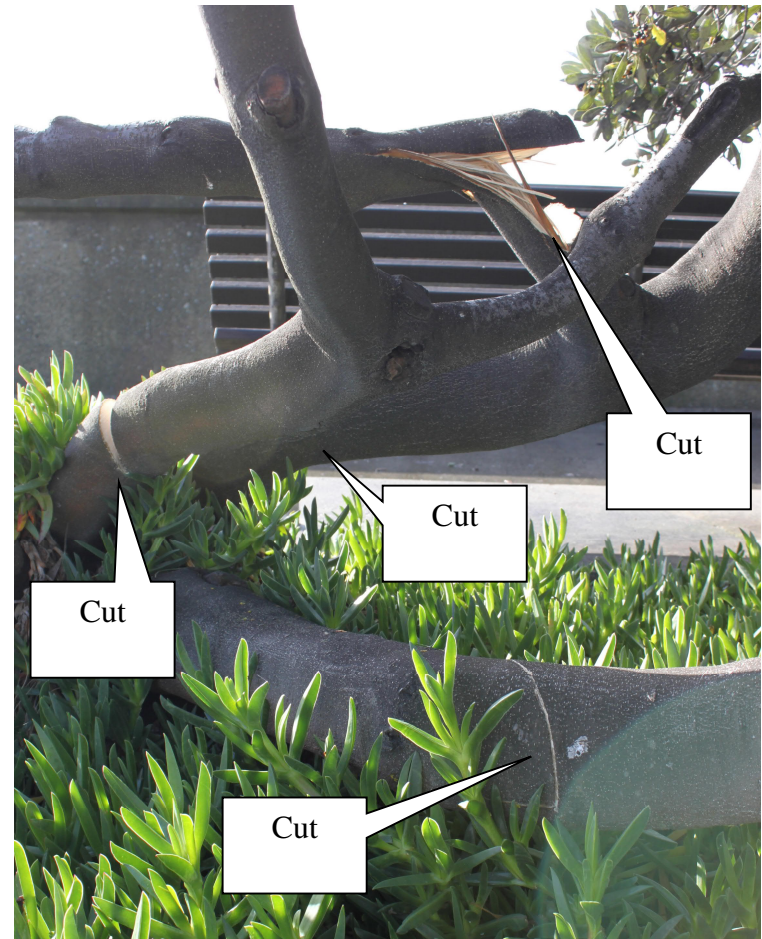
This act of vandalism was noticed on Sat 16 June.

Regardless of who did this, the question lies as to how this could be avoided. I am looking for a win-win solution.

Firstly I am interested to ask beach front properties on what they think the solution might be. I am interested to listen to your views as you are most affected.

Please write your proactive comments on the back and drop into the black drop box at the community noticeboard beside the Sumner video shop. Your comments will be anonymous.

Regards Marnie Kent



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Regards Marnie Kent

Submission 34488

The difference in the before and after photographs of this Christchurch deforested property in the Residential Medium Density Zone speak for themselves.

BEFORE



AFTER



BEFORE



AFTER



Under the current District Plan and Tree Policy these confronting images do not paint a pretty of what the future holds for Christchurch, or the leafless environment in which residents will be living.



This healthy tree was recently felled in Guild Street, Richmond, due to a lack of regulation which would have otherwise protected it. It was the tallest tree on the street and was visible from a great distance, and is therefore a significant loss.

To: Linwood-Central-Heathcote Community Board
From: Elizabeth Graham, [REDACTED]
Date: Monday 02 November 2020
Re: Unsatisfactory Consultation Process for Draft Tree Policy 2020

1. I'd read, probably in The Press offline, that this would go out for consultation in September. I saw no further information despite reading offline every issue of The Press and The Star newspapers, including the public notice pages.
2. Sometime in October I asked about it at either Linwood or Lyttelton Library&Service Centre, and was told "it's online". I told the staff that I don't go online after a career in government computing. A staffer offered to get me a printed copy, and gave it to me a day or so later.
3. Realising that submissions would close on 12 October, and that the Tree Policy statements were so generalised, I had to accept that there just wasn't enough time for me to do a thorough analysis and put in a decent submission. So I phoned tree-loving friends (aged 50 - 80+) and was horrified to find that each of them said that they didn't know about it. Something is very wrong when people who have loved Christchurch's beautiful trees for decades are unaware of consultation on them.
4. I want Council to reopen consultation for another month with adequate offline publicity.

Eliz G

Note 1 I've been researching trees for about 10 years and have a file of printed information, including photos of ugly pruning by Council's contractor Tree Tech. I've also had stand-offs with Tree Tech when they've arrived to prune a pine tree opposite where I've lived for years. On the first occasion, the police arrived and warned me I could be arrested, then they spoke to Tree Tech staff who immediately packed up and moved on. Recently CCC Arborist Dieter Steinegg came and spoke to me which I appreciated and found interesting and useful.

Note 2 I intend to follow up on the issue of consultation in general, and the issue of digital exclusion mentioned to me by Citizens Advice Bureau which is taking a petition to the government, I understand. In 1993 there was a court definition of consultation but due to copyright I'll only be able to read it by visiting the university library which has been most helpful.

I will keep you, my Community Board, informed. Keep up the good work!

ALSO, I'LL CHECK THE LOCAL GOVERNMENT OFFICIAL INFORMATION AND MEETINGS ACT (LGOIMA) TO CHECK WHETHER RESTRICTING/CONFINING INFORMATION TO DIGITAL USERS BREACHES THE ACT.
(SPOKEN TO THE COMMUNITY BOARD BUT NOT IN WRITING TO IT.)

Have your say

Draft Tree Policy

Make sure your comments reach us before 5pm on Monday 12 October 2020.

ccc.govt.nz/haveyoursay

Please indicate your views:

Do you have any comments on the Draft Tree Policy?

I APOLOGISE FOR THIS VERY LATE SUBMISSION.

MY GREATEST CONCERNS RELATE TO THE DRAFT TREE POLICY'S STATEMENT 2.0 MAINTENANCE OF TREES IN PUBLIC SPACES.

NOTE :-

ON MONDAY (02/11/20) I READ OUT MY PREPARED STATEMENT (SEE ATTACHMENT), ABOUT THE UNSATISFACTORY CONSULTATION PROCESS FOR THE DRAFT TREE POLICY, AT THE PUBLIC FORUM OF THE LINWOOD-CENTRAL-HEATHCOTE COMMUNITY BOARD MEETING. AFTER I'D SPOKEN, I UNDERSTOOD FROM CR YAVI JOHANSON THAT I COULD PUT IN A LATE SUBMISSION AND THEN PROVIDE DETAILS TO THE HEARING

Comments continued:

PANEL (ON 7 DECEMBER?).

IF MY DETAILED SUBMISSION HAS TO BE PROVIDED BEFORE THE HEARING PANEL MEETING, PLEASE LET ME KNOW. AS I'M NOT ONLINE, HAVE NO CELLPHONE OR ANSWERPHONE, WOULD YOU LEAVE INFORMATION FOR ME AT LINWOOD SERVICE CENTRE. STAFF THERE KNOW ME (AND HAVE BEEN SO HELPFUL) AND I VISIT THE LIBRARY/SERVICE CENTRE ALMOST DAILY. OTHERWISE TRY PHONING MY LANDLINE 389-4682 BEFORE 10AM.