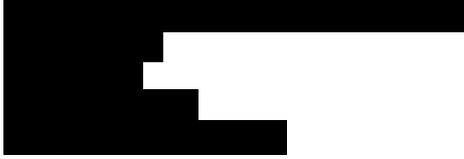


Your submission to Draft first set of National Planning Standards

Treecology Tree Consultancy (Jez Partridge)



Reference no: 55

Clause

Overarching comment

Notes

My submission relates to the definition of protected trees, and specifically the definition of a 'Root Protection Area' (RPA), and the absence of any definition for the 'trimming or pruning of trees'. Section 76 of the RMA gives Councils the ability to restrict the felling or trimming of trees, and so a definition of 'trimming' should be included in the definitions section of the National Planning Standards. Not having this term defined is currently causing disagreement and lack of consistency across District Plans. This would provide an opportunity to ensure that there is a consistent understanding of the term trimming nationally as currently each District Plan interprets this differently and this is confusing for arborists and tree owners. It should be made clear that tree roots are also protected from trimming and the RPA defines the area of roots where consent would be required to trim a tree, if such a rule is included within a plan. I am a Consulting Arborist and I frequently represent both Councils and clients in understanding and sometimes disagreeing on the definition or extent of protected roots and what may be allowed or not by terms such as the term minor trimming which is often found in District Plans. I would be happy to meet with MfE to discuss these matters further and help to develop more consistent definitions of the terms Root Protection Area and Trimming.

Clause

Individual definition

Notes

The proposed definition of the Root Protection Area is currently - The root protection area means the circular area surrounding a tree, which is the greater of the radius, measured from the base of the trunk to: a) the outer extent of the branch spread; or b) half the height of the tree. If this definition is included in the final standard, a diagram similar to the CCC Replacement District Plan dripline definition will be included, eg.: The above proposed definition essentially references the pre 2005 British Standard 5837 RPA recommendations. The updated and improved 2005 & 2012 BS5837 (section 4.6) now uses the 10 or 12 multiplied by the trunk diameter formula to calculate the RPA. This formula would be better to have in the National Planning Standard to calculate the RPA as it is improved best practice, and better estimates the actual likely rooting area for a typical tree.