



Draft first set of National Planning Standards

SUBMISSION FORM

The Government is seeking views on the draft first set of National Planning Standards.

For more information about the Government's proposals read our National planning standards consultation document available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>.

Submissions close at 5:00 pm on Friday 17 August 2018.

Making a submission

You can provide feedback in three ways:

1. Use the online submission form available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>. This is our preferred way to receive submissions.
2. Complete this submission form and send it to us by email or post.
3. Write your own submission and send it to us by email or post.

Publishing and releasing submissions

All or part of any written submission (including names of submitters) will be published on the Ministry for the Environment's website www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, we will consider that you have consented both your submission and your name being posted to the Ministry's website.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment. Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

Submission form

The questions below are a guide only and all comments are welcome. You do not have to answer all of the questions. To ensure your point of view is clearly understood, please explain your rationale and provide supporting evidence where appropriate. The structure of this form is in line with the draft first set of national planning standards as shown in the overview section tables 1 and 2.

Contact information

Name*	[Redacted]	
Organisation (if applicable)	[Redacted]	
Address	[Redacted]	
Phone	[Redacted]	
Email*	[Redacted]	
Submitter type*	Individual	<input type="checkbox"/>
	NGO	<input checked="" type="checkbox"/>
	Business / Industry	<input type="checkbox"/>
	Local government	<input type="checkbox"/>
	Central government	<input type="checkbox"/>
	Iwi	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/>

[Click here to enter text.](#)

* Questions marked with an asterisk are mandatory.

Draft first set of National Planning Standards

1. Do you support the draft first set of National Planning Standards?

- Yes
- No

2. CM-1: Definitions standard

Root Protection Area (RPA)

a. Individual definition

Please refer to attached

b. Additional definitions

[Click here to enter text.](#)

Releasing submissions

Your submission may be released under the Official Information Act 1982 and will be published on the Ministry's website. Unless you clearly specify otherwise in your submission, we will consider that you have consented to both your submission and your name being posted on the Ministry's website.

Please check this box if you would like your name, address, and any personal details withheld.

Note that the name, email, and submitter type fields are mandatory for you to make your submission.

When your submission is complete

If you are emailing your submission, send it to PlanningStandards@mfe.govt.nz as a:

- PDF
- Microsoft Word document.

If you are posting your submission, send it to National Planning Standards, Ministry for the Environment, PO Box 10362, Wellington 6143.

Submissions close at 5:00 pm on Friday 17 August 2018.

[REDACTED]
[REDACTED]

As the professional body representing New Zealand's qualified Arborists, the [REDACTED] [REDACTED] welcomes the inclusion of root protection area (RPA) as a defined term in the *Ministry for the Environment. 2018. Draft National Planning Standards (The Draft)*.

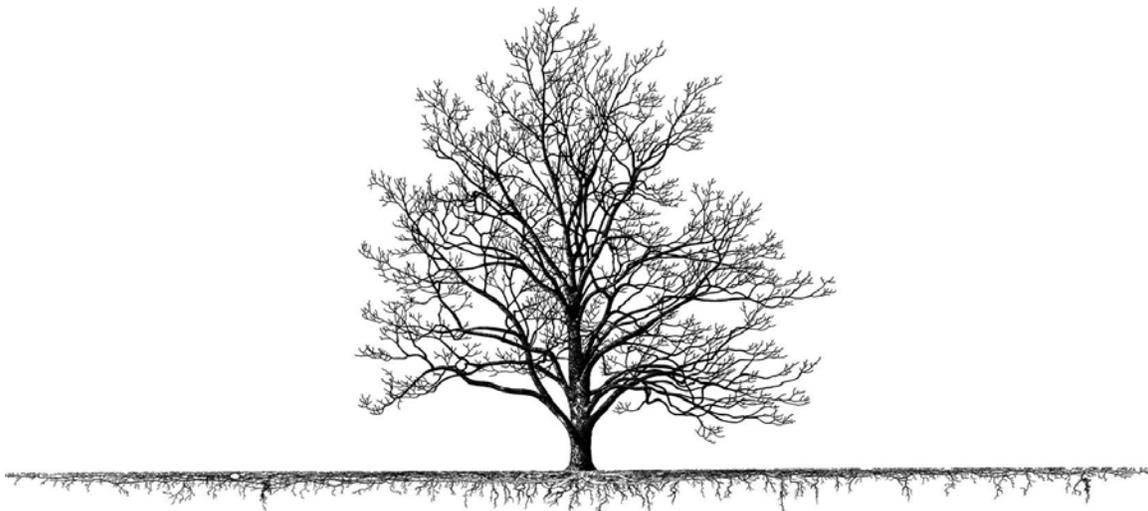
The Draft currently defines the root protection area (RPA) as *the circular area surrounding a tree, which is the greater of the radius, measured from the base of the trunk to: a) the outer extent of the branch spread; or b) half the height of the tree*. This being the area within a tree's drip line.

[REDACTED] proposes root protection area (RPA) to be defined as:
A root protection zone is the [arborist-defined] minimum area surrounding the trunk of a tree deemed to contain sufficient roots and rooting volume to maintain a tree's viability and to ensure future tree health and stability. The preliminary RPA can be determined as a circle with a radius twelve times the diameter of the tree's main stem (trunk).

[REDACTED] would like a revision to the definition of root protection area to be accepted as proposed. Based upon arboriculture industry best practice and standards, we recommend the definition be brought into alignment with the international industry standards and published BMP's referenced. A consistent method to determine the root protection area is to take a radial measurement from the base of the tree, which is founded on the diameter of a tree's trunk.

The use of drip line is often flawed as it unintentionally misrepresents a tree's root zone accurately.

This Morton Arboretum pictorial is a good diagram to demonstrate this:



When tree protection fencing is installed at the drip line of a large mature tree that has grown in an open area, the tree may consequently lose >50% roots. The drip line attempt at tree preservation can mistakenly lead to unanticipated stress and decline even though the intent was to protect and preserve it.

An example of the difference in RPA can be demonstrated by visualizing fencing installed at a drip line of a mature tree that has a trunk 1m in diameter. The outer branches may fall only six metres from the base of the tree due to species specific canopy form or prior pruning; whereas, when measured as a function of the trunk diameter, root protection fencing is placed at an appropriate 12 metre radius of root zone to be protected.

Confusion in the application of the drip line definition for tall excurrent, fastigate or columnar trees is commonly encountered in the field, this issue will be rectified with the adoption of the trunk measurement method.

The [REDACTED] is requesting that the Root Protection Area (RPA) in the *Draft National Planning Standards* is defined in congruence with industry best practice and standards and that the drip line diagram shall also be removed from the definition.

References:

The American National Standard: ANSI A300 (Part 5)-2012: Management of Trees and Shrubs During Site Planning, Site Development, and Construction

Best Management Practices: Managing Trees During Construction, Second Edition 2016, ISA

Australian Standard: AS 4970 - 2009 Protection of Trees on Development Sites

The British Standard: BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations.