

Submission from Cambridge Tree Trust to WDC on Plan Change 2/protected trees

17 June 2019

My name is Jane Moodie, and I was one of the original submitters, but I am here today to speak for the Cambridge Tree Trust which made a further submission on the issue of Protected trees. Cambridge Tree Trust is pleased to have this opportunity to make submissions on the proposed Plan Change 2 regarding Protected Trees, which we see as part and parcel of a wider tree policy, which again should be part of council's climate change policy.

We were pleased to be able to meet in 2018 with the consultant arborist, Craig Webb, and others from the council staff, for what we felt was a constructive discussion. We consider that Mr Webb's report is thorough, and are pleased to see that Council has adopted some of his recommendations. These include:

1. The change to STEM evaluation of protected trees which we have maintained is a more accurate method of assessment, including wider parameters and removing the distortions of a multiplier system like that of the NZIH scoring system.
2. Recognition of the importance of the root protection zone of trees, and the need to keep this intact when planning for buildings and subdivision.
3. We are pleased to see the proposed Tree Policy included in the documents for this discussion, although I will have more to say on that.

We do however still have concerns, and these accord with a number of other submitters. The three topics I will address are the following:

1. the level of the protection threshold
2. The lack of an adequate process to identify protected trees for the future,
3. And finally some comments on the proposed tree policy as it relates to Protected trees

The following is our first concern:

1. **The setting of a protection threshold at a STEM score of 120 is too high.** This results in the delisting of more than one third of the protected trees in the district. To be precise of the 126 on the list, 6 have already been removed,

and a further 47 delisted. If all these trees were removed this represents a significant loss to the district and to Cambridge in particular, as the main repository of protected trees in the district. The Cambridge Tree Trust is appalled at this and would like to see this threshold lowered by council. If this threshold was lowered to 100 it would result in the delisting of 7 currently protected trees, if to 108 only 12 would be delisted, and if it was lowered to only 110 it would result in the delisting of 20 currently protected trees. Any of these thresholds would at least avoid the wholesale slaughter of protected trees presently proposed. Let me give you an example of what may occur if the STEM score is not lowered. It is a strange anomaly that the Gingko tree outside the motel at 63 Hamilton Road, which was voted top tree of Cambridge for this year's Autumn Festival, was given a STEM score of 114 and has thus been delisted and becomes subject to possible removal. Likewise a *Nothofagus menziesii* (native silver beech) at 63 Princes St has been delisted at 114 leaving only one native beech still on the protected list. The *Acer palmatum* (Japanese maple) at 52 Thornton Road, surely one of the most impressive maples in the whole town is also delisted at 114.

2. Now we are aware that on p. 18 of the Hearing Report for Plan Change 2, point 5.4.7 the argument is made that further submissions can only support or oppose a primary submission point, and that therefore the Tree Trust's further submission that the STEM threshold score be lowered from 120 to 100 is disallowed as it is a new issue. This ruling is in our view completely disingenuous, and plays on semantics. In the primary submissions a number of submitters (Christopher Floyd, Roger Jordan, David Phillips, and myself) all made the point that the number of trees that could be lost under this arrangement was too high. Unfortunately it appears that none of us thought to request that the threshold be set at 100, although indeed I myself did ask that it be lowered, without specifying the level in my primary submission. However I would have thought that the lowering of the threshold would have been one obvious conclusion to draw from these comments. To pretend otherwise is as I said disingenuous. I believe that in listening to these submissions council needs to be cognisant of the fact that many of us are unused to the finer requirements of this system, and that if local democracy is to flourish allowance should be made for this.

3. The question of lowering the threshold of 120 has been one of the main points raised by the Tree Trust in its submissions, but this was also rejected by council on the grounds that 120 had been recommended by the consultant Arborist, Craig Webb, as the score employed by many other councils. However Mr Webb also states in his February 2019 report that in view of Cambridge being known as the Town of Trees lowering the protection threshold here would be justifiable. Furthermore he admits he has made a very conservative evaluation, and suggests that a more acceptable result might be achieved by applying a 'more liberal' scoring system, taking into greater account the contribution of trees to the built environment, as natural infrastructure and for the ecological services they provide, as well as their historical and cultural values. The Cambridge Tree Trust urges council accept these qualifications to his position and to make these changes in the interests of preserving more of our protected trees. If Cambridge is to remain the Town of Trees the aim should not be to do the same as other councils, we should do better. We endorse the comments along these lines from Roger Jordan.
4. **The second concern of Cambridge Tree Trust is the lack of an adequate process to identify the Protected trees of the future.** Without this Cambridge will see a progressive loss of protected Trees though aging and natural attrition, with no replacement. We have a list of Notable trees which might prove helpful to some extent, although many of these are on public land. We would also like to see the protection of suitable trees on future greenfields development sites. At our meeting with Craig Webb he told us that such an approach has been adopted by many overseas jurisdictions, and is a requirement **before** any planning is undertaken, let alone before the arrival of bulldozers and chain saws on the site. Furthermore during the development process the root protection zones of such trees are protected from incursions by all heavy machinery in order to maintain their integrity. The council currently has several such greenfields subdivision areas in Cambridge, C1, 2, 3, and no doubt there will be more. Cambridge Tree Trust requests the Waipa District Council to adopt such a policy speedily. This would ensure that new developments would, from the outset, have the advantage of significant

amenity trees. The proposed Tree Policy item 10.iv allows 'that where tree removal is necessary to make way for Council-approved capital development ... the process will involve public consultation if a tree proposed for removal has a STEM score greater than 138'. We suggest that this clause should be strengthened to simply prevent the removal of such trees from greenfields development sites. If they can do it in England or France, then surely to goodness we can do it here. On the other hand unfortunately the Tree Policy, item 19, states that a tree owner may only apply for protection of that tree if it scores at least 120 points on the STEM system. Any evaluation system, whether STEM or any other, which attributes value on the basis of size and standing in the environment is not going to be helpful in identifying our future protected trees, as Craig Webb himself points out. He has proposed a lower-tiered scoring system specifically to deal with the issue, (Executive Summary, page 2 of Plan Change 2, An Arboricultural Review, dated 22 June 2018) and the Tree Trust would like council to consider this seriously, if we are not to lose all our protected trees as time goes by.

- 5. The Tree Trust was pleased to see a draft Council Tree Policy included in the documents for this hearing.** CTT would appreciate the opportunity in future to have some input into this. We were pleased to see that a number of other submitters were anxious to see the council deal with Protected trees within the context of a wider Tree Policy, with stronger moves to manage trees on Council ie public land. The Tree Trust approves of the recognition of the importance of the Root protection zone; preserving the integrity of this zone during subdivision and building will extend the longevity of protected trees in the future. We also approve of the intention to plant larger long term trees in suitable public spaces (in this connection it is regrettable that a number of such opportunities have been missed in recent years. - the round about by St Andrews church was **not** planted with a large species but what I call a lollipop tree, and the intended roundabout near the Avantidrome is apparently destined to have a sculpture, which we will be able to whizz by without appreciating, rather than trees which would have made an important statement about Cambridge. Compare this with the many large roundabouts in Hamilton now beautifully planted with pin oaks) We hope that the council

will look more carefully in future at the possibilities that present themselves in this regard, and furthermore will look to actually creating the public spaces that can cope with such trees. We were pleased to see that a Council Tree Register will be maintained for trees on public land. Is this a new register or does it already exist? In either case we hope it will be available to the public and will also include information on the historical, and cultural values of these trees . Our final comment on the proposed Tree Policy concerns its purpose which seems limited to a mere management document: the management of amenity trees on Council land and Protected Trees on private property. Surely this could have addressed the importance of trees in the landscape, the environment and in climate change policy. It could have included some vision of more planting throughout the district with this crisis in mind. If our children and grandchildren care enough to demonstrate in the streets about the climate crisis, it is more than time that we as citizens respond, and council needs to lead. Earlier generations of citizens and councils have shown us the way with their tree planting, and Cambridge Tree Trust again challenges this council to demonstrate far greater vision with regards to its proposed tree policy.