

Please indicate your position on the draft Tree Policy 2023	Please describe the reasons for your position on the draft Tree Policy 2023	Do you have any other comments you wish to make as part of your submission?	Officer Comment
Neutral	Some trees are just too tall and need maintenance or removal.	The trees on Mt Aspiring Road near the Far Horizon subdivision are far too high these need to be topped or heavily pruned. Some trees have big branches over the footpath and houses. They could cause a lot of damage if they fall.	Topping is not supported under the Tree Policy. We do recognise that certain areas and subdivisions require specific tree strategies due to historic poor tree placement and species choice.
Support	It is well-considered, appropriate, and mostly addresses the current and future needs of trees and the community.	<p>Yes - I would like to make the following recommendations / suggested additions:</p> <p>Tree maintenance 2.6 Maintenance/Clearance; I suggest that you include a reference to "maintaining trees clear of overhead utility lines in accordance with relevant regulations". (Yes, utility line clearance is included in 4.7 but it wouldn't hurt to be included in 2.6 as well).</p> <p>2.7 Risk; the industry body for arboriculture in NZ (the NZ Arboricultural Association) recommends both Quantified and Qualified Tree Risk Assessment methodologies, by specifying one you are limiting yourself. Suggest the line is amended to "Utilise the Visual Tree Assessment and recognised arboricultural industry Tree Risk Assessment methodologies to manage the risk posed by trees in a proportionate and practical way.</p> <p>4.2 Removal (as noted above the industry body for arboriculture in NZ recommends more than one tree risk methodology): 4.2 notes, risk is determined by using the Quantified Tree Risk Assessment (QTRA). I suggest that the note is amended to "risk is determined by using a recognised arboricultural industry Tree Risk Assessment methodology".</p> <p>4.17 Removals; Require all tree removals to be undertaken by a suitably qualified works arborist. Not all tree removals/situations require the skill of an arborist. I suggest the line is amended to read, "Require all tree removals to be undertaken by a suitably qualified works arborist or appropriately skilled contractor.</p>	Points have been incorporated into the Tree Policy.
Oppose	The trees selected by our developer have wide root systems which are inappropriate for our narrow berm and are raising footpaths and surfaces. These pin oaks grow vigorously to a height of 80 feet and a spread of 25-40 feet, to require annual attention. We are concerned about the impact on our view.		Removal of trees for views is not supported under the Tree Policy, however we now have a more robust process for reviewing appropriate species in new subdivisions. Historic issues like this could be addressed under a tree strategy.
Neutral	I consider the Tree Policy 2023 should reference the Property Law Act in relation to the effect of Council managed trees on private property. Additionally, I believe that the policy when specifically considering public safety should reference the specific method being used for the assessment of risk to property and individuals. Any risk assessment that is conducted on trees should be readily available to the public together with the risk assessment methodology. For example, what is considered an acceptable angle (15, 20, 25 or 30 degrees) for a tree to lean, how is the amount of "rot" in a tree assessed, and if branches of different trees are in	The accountability for a tree that is located on a council/private land boundary needs to be explained in the policy. There are several "wilding trees" located across council/private land boundaries in Arrowtown	Policy references what risk methodologies are used, as per Section 2.0.

	close proximity to each other considered in relation to wind damage to each other.		
Neutral	<p>There are many parts of your Tree Policy that I support. However, you state that one of your objectives is that appropriate trees are planted in appropriate places.</p> <p>There are trees in Arrowtown that were planted decades ago with no thought given to eventual height. There would be much better species planted to give the amenity values that the Policy talks about. Tree Maintenance. The Policy says to avoid pruning for enhancement of views. Please reconsider this statement. Trees can often be sympathetically and professionally pruned while still allowing for views to be enjoyed.</p> <p>"Prohibit tree removal to reduce shading". Allowances should be made where inappropriate trees were planted, not maintained and subsequent shade adversely affects properties.</p> <p>Appropriate deciduous trees could be planted instead.</p>	<p>Please keep planting for colour in Arrowtown, especially exotics. Our town depends on it.</p> <p>Thank you.</p>	<p>Historic issue. Could potentially address under a tree strategy. Planting locations are now reviewed more carefully as part of QLDC planting programmes, including succession planting of mature tree stock.</p>
Oppose	<p>Still no acknowledgement that existing large trees (wilding or not) contribute to carbon sequestering and planting 2 trees in their place is not enough to help fight against climate change from removing them. Especially replanting with small natives that are often overrun by smaller pest trees and take too long to start contributing to carbon sequestering. No mention of removing slash and trees to help the ecosystem actually flourish instead of waiting 20 years for it to break down. Queenstown's main income is tourism and the existing conifers are what make us different to Cromwell or Wanaka. There are several subalpine areas that have no pines (everything over the lake, everything south of Wilson Bay) supporting the native flora and fauna. Removing more from the existing area is only leading to higher erosion, flooding, cost and not supporting the generations to come with climate change requirements. Native New Zealand isn't a reality, we build roads and infrastructure on the side of a mountain and expect small native plants to stabilise the banks. I'd prefer to see New Zealand still around in 50 years then 20 years of native New Zealand and climate change taking us all out.</p>	<p>Reduce bias working with Wakatipu wilding pine organisation, support the local community in the beautification of Queenstown - the Queenstown gardens aren't native and look what they bring.</p>	<p>Canopy loss is accounted for in the Tree Policy and recognises that more trees than the 2-for-1 may be required, as per Policy 5.1. Wilding pine removal applications have slowed due to reduced government funding.</p>
Oppose	<p>I think the rules around tree removal are too stringent. Using the QTRA as the only way of deciding if a tree/trees should be removed is not in the best interest of the public. I think that falling litter, shading and views should be given more priority in deciding if trees should be removed. The Arborist and Council staff should be able to make a more holistic and common-sense recommendation to Council rather than just be bound to the QTRA report. There should be more weight allowed for the wishes of the affected parties when considering tree removal.</p>	<p>Under the present policy around tree removal it seems that trees are more important than the ratepayers and people who live, work and play in our wonderful area of New Zealand.</p>	<p>Tree removals are considered on a case-by-case basis, not just based on risk.</p>
Support	<p>Overall this is a practical policy to manage trees in the Queenstown area.</p>	<p>I would like to draw your attention to wrong trees that have been planted in the wrong place when new housing is being developed. Horse Chestnut (<i>Aesculus hippocastanum</i>) trees have been planted in Wellswood Way Quail Rise. These trees grow to approx. 25 metres tall and 15 metres wide and are not suitable for long term planting on street frontages. They also produce large brown nuts in the autumn. Rule 4.11 would prohibit removal of these trees.</p>	<p>Historic issue. New subdivisions have a more robust species and location review process. Tree strategies can help to address the wider issue of wrong tree, wrong place, and include succession planting.</p>

		I would suggest that these trees be progressively removed and replaced by a more suitable species before they grow too large as this would be a cheaper option, which has already been done elsewhere in Quail Rise.	
Oppose	<p>Whakatipu Wilding Conifer Control Group Inc (WCG) wish to oppose the draft Tree policy in its current form. Changes are needed in this draft policy in relation to the management of Wilding Conifers and suggestions follow.</p> <p>It is great that self-seeding wilding trees are excluded from the proposed policy. But there also should be stronger emphasis to favour removal of pest agent trees, planted or not, to align the tree policy with the council's own existing policy in section 34 of the district plan.</p> <p>1) Add to proposed 1.8 - "and the Otago Regional Council Pest Management Plan."</p> <p>2) Proposed 4.9 should have stronger wording. The original wording in 4.11 was better. But as a suggestion: "Favour the removal of trees which are of pest exotic species, those with potential invasive spread, and listed as prohibited in QLDC's District Plan Wilding Exotic Trees Chapter (Chapter 34 of the Proposed District Plan) and listed in "Table 2: Organisms classified as pests" of the Otago Regional Council Regional Pest Management Plan or classified as a Pest Agent Conifer under Plan Rule 6.3.4.4 of the Otago Regional Council Regional Pest Management Plan. This includes the removal or poisoning of pest trees. Requirement for replacement planting will be determined by any amenity values the trees provided."</p> <p>3) The following text in 4.11 relating to wilding conifers has been lost and should be added back in. "This includes the removal or poisoning of pest trees. Requirement for replacement planting will be determined by any amenity values the trees provided."</p> <p>4) Proposed 4.17 is inappropriate and favours arborists and higher costs, it is not necessary nor practical for the tree removal to be always done by an arborist and in many cases a suitably qualified tree faller is more than capable to undertake the activity. Recent WCG examples: Queenstown golf club tree removals – no arborist involved – Trees removed by a Logging crew with Forestry qualified tree fallers using manual and machine falling techniques Kelvin heights Nursery tree removals – no arborist involved – Trees removed by a Logging crew with Forestry qualified tree fallers using manual and machine falling techniques Arrowtown golf club tree removals – no arborist involved – Trees removed by a Logging crew with Forestry qualified tree fallers using manual and machine falling techniques</p>		Feedback acknowledged and Policies 1.8, 4.9, 4.19 and 5.2 updated.

	<p>Pending Centennial Avenue removals – no arborist is planned – Trees would be removed by a Logging crew with Forestry qualified tree fallers using manual and machine falling techniques In other cases WCG have removed large trees from QLDC lands (like Quail rise) using an experienced crew who were Advanced tree falling practitioners under Non-productive forestry certifications, not arborists but competent and qualified for the activity.</p> <p>5) The wording of proposed 4.13 is odd. In nearly every request that WCG make, the trees would be unsuitable for its location due to species type. Refer to the above suggestion "Favour the removal of trees which are of pest exotic species, those with potential invasive spread, and listed as prohibited in QLDC's District Plan Wilding Exotic Trees Chapter (Chapter 34 of the Proposed District Plan), and listed in "Table 2: Organisms classified as pests" of the Otago Regional Council Regional Pest Management Plan, or classified as a Pest Agent Conifer under Plan Rule 6.3.4.4 of the Otago Regional Council Regional Pest Management Plan</p> <p>6) The following text in 4.11 has been lost and needs to be replaced as it affects the proposed policy 4.13, 4.18, 4.19, 5.1 and 5.2 "This includes the removal or poisoning of pest trees. Requirement for replacement planting will be determined by any amenity values the trees provided" It is not feasible to expect a two for one planting policy for wilding specie trees, especially as WCG has a mandate for control, not planting. WCG funds do not extend to planting costs. In the words of a WCG Executive member & WRT member, Tom McPhail "It's much more effective to save native plants with wilding control than it is to go through the labour intensive job of growing and planting natives"</p> <p>7) Proposed 4.19 is confusing in relation to wilding conifers and in relation to proposed policies in 5.0</p>		
Oppose	<p>1. Two trees replacing one tree removal so as to reach existing canopy within 20 years is too short a time frame. It is inconsistent with the stated desire to allow a tree to reach its natural state. 20 years is a very short time frame for a tree which the council states is not to be removed once planted except under unusual circumstances. One carefully chosen tree to at least a 30-year plan would be preferable as well as cheaper for the council.</p> <p>2. I see no mention of the council agreeing to uphold previously discussed and consented community tree plantings. My example of this is the Millennium track planting from Stony Creek to Waterfall Creek</p>	<p>Question 8 is too simplistic as I am only looking for modifications rather than a support /oppose.</p> <p>I am trying to think of this draft from a resident, public and council point of view and appreciate the chance to comment.</p>	<p>The Tree Policy supports community planting and QLDC have agreements in place to oversee maintenance and upkeep outside of the Tree Policy. Tree removals reviewed on a case-by-case basis.</p>

	<p>The pamphlet from the time it was planned and consulted on, specifically states no neighbours views to be compromised and it clearly states the types of trees to be planted. Unfortunately, bigger trees such as beech trees have been planted only one to two meters from this immensely popular track and will require much cost of trimming if they are to remain there without compromising the track usage. These big trees will also block neighbours views. The community and council agreed to the original planting plan. This and other community/council agreed planting planned should be acknowledged somehow in the tree plan as it has proven to be almost impossible modify incorrect plantings.</p> <p>3. Mention should be made in the plan about the council being able to specify that community planting will not add more cost to council weed control. An example of this is where greenery needs to be regularly cut back from public tracks because flaxes and shrubs are planted to close to tracks. and then plantings just becomes a hedge as can be seen between the dinosaur Park and the road roundabout. Also cabbage trees planted too close to waterways, drop leaves which regularly block these waterways and prevent drainage on tracks. This maintenance adds unnecessary cost to the council.</p> <p>4. A tree should be able to removed if it is giving bother . Too few planters can visualize the final result and this lack of vision should not compromise the next generation. A better plan is to look at tree planting with at least a 30-year vision.</p> <p>5. It is pleasing to see the awareness of both native and exotics being important to the cultural make up of our area.</p>		
Support	It is prudent to have a Tree Policy and amend it as necessary.	<p>The definition of significant trees needs to encompass greater criteria and increased opportunity for public consultation in the decision-making process.</p> <p>The requirement for the replacement of trees removed should be a shorter time period than 20 years.</p> <p>Wilding trees in the Gardens should be managed in a progressive way. For years it has been advocated that parcels of pine trees be removed in a scalloped nature and replanted with more suitable trees which also provide wind shelter. Once established, move on to another area. Areas could, for example, be planted with trees that reflect the different nationalities of our residents and visitors.</p> <p>QLDC should be more proactive in the maintenance of trees in our Reserves especially those that border water, such as Horne Creek.</p> <p>We encourage continued community consultation in the protection and management of our trees.</p> <p>Thank you for the opportunity to submit on the Draft Tree Policy.</p>	Definition of a significant tree has been reviewed and updated.
Neutral	We refer to the submissions of Brian Fitzpatrick and the Friends of the Wakatipu Gardens and Reserves and join in and support them.	We note and repeat all past Tree Policy submissions and those made in respect of the controversial Hotops Tree removal proposal. We wish to be heard at any hearing.	As addressed in email submission below.

Support	I support the policy for the reasons that all trees have a place in our environment. While there is an important drive to replace the native forest and indigenous flora, it is also important to recognise our Otago Gold heritage trees that burst with colour every autumn and remind us of the early settlers. These trees (poplars, Horse Chestnut, Maple, Rowan, Silver Birch, Oak, and Elm) are getting an unnecessary bad rap and are more than "just an amenity." If Council really wish to keep this part of Otago alive ...and as a visitor attraction, then there needs to be urgent action to stop the destruction of these trees.	It is fine to have a policy that embraces exotics and native trees in theory, however it is another issue to ensure that exotics are not cast into the "wilding trees" category. It is becoming apparent in some areas that this is occurring by stealth and extra rules as to the removal of these exotic trees need to be more comprehensive.	The Tree Policy supports both native and exotic tree establishment.
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Email submissions

Thank you for considering this submission on the draft Tree Policy. I greatly appreciated the willingness of staff to consult on this draft of the policy and the opportunity to discuss it with Briana and Jeannie. I support most of the Policy as circulated.

The key change I would like council to make is to widen the definition of "Significant Tree" and make it more applicable to our local Queenstown Lakes District circumstances.

The importance of getting a good workable definition of "significant tree" is that under the new proposed policy there will be only one criterion for undertaking public consultation on a tree removal and that is that it must be a significant tree.

The current definition of Significant Tree in the draft policy is:

The 'significance' of a tree is determined by the Council arborist and/or Parks Officers based on factors such as long-term life expectancy, amenity, heritage, location, number of trees identified and landscape and wildlife effects.

My suggested amendments are as follows, with the proposed additions underlined:

The 'significance' of a tree is determined by the Council arborist and/or Parks Officers based on the following factors:

- Age and condition, including long-term life expectancy,
- amenity, heritage (including whether it is a commemorative tree), location, ~~number of trees identified~~ whether it is part of a group of trees, and landscape and wildlife effects.
- Historical, cultural, scientific or botanical significance,
- Special significance to Takata Whenua, and
- Whether the tree has been identified in the District Plan or a Reserve Management Plan or has been listed as a Notable Tree on the NZ Tree Register*.

I note that there is no mention of Takata Whenua anywhere in the draft Tree Policy and I believe it would be appropriate to record that Council is cognisant that Takata Whenua may have an interest in certain trees in the district, as I have proposed above.

*Note: The New Zealand Tree Register is supported by the NZ Arboricultural Association and the NZ Institute of Horticulture. There are 152 registered trees in Otago and of these, 16 are in Queenstown, 14 in Wanaka, 3 in Arrowtown, 3 in Lake Hayes and 2 in Frankton. As with the rest of the policy, Council's Tree Policy would only apply to a registered notable tree if it was in a Council reserve or on council road or land.

Other amendments I would recommend are:

1. A change to the definition of "Exotic" or alternatively the addition of a definition of "Native tree". The current definition reads:

"Exotic: Species which are not indigenous to that part of New Zealand."

By way of one example I note that there are now two Kauri trees in the Queenstown Gardens. While Kauri trees are not indigenous to Otago they are a native New Zealand tree and it would be confusing and illogical to have them categorised as exotic.

2. The addition of the word "removing" to the first paragraph under the heading "Objectives" as shown underlined below.

Objectives

The principal objective of this Policy is to provide guidance as well as consistency and clarity in decision making when considering requests for planting, maintaining, working around, removing and replacing trees on Council land.

It is apparent that the Policy is intended to deal with tree removals (see Section 4 Policies 4.1 to 4.19) so this seems to be an unintended omission.

3. The inclusion of the word “roads” in the first paragraph of the Policy Scope (as shown underlined below).

Policy scope

This Policy applies to all requests relating to trees on Council administered reserves, civic open spaces and other Council-owned property, including QLDC owned land which is licensed and leased to third parties (such as campgrounds), roads and the road reserve (including unformed legal roads). The Policy also applies to all land owned or leased by QLDC which may be designated by another Requiring Authority under the Resource Management Act.

The reason for this suggestion is that the policy should be easily understood by the average reader and not everyone understands the significance of the term “road reserve”. Most people do, however, understand the term “road”. I recommend including both terms.

4. Consider a second option that would make it easier for members of the community, with Council approval, to enhance street amenity or a local reserve. Policy 1.7 states: “Require a Licence to Occupy for the planting of any trees by a private individual.”

There may be occasions where a property owner or a group of neighbours would like to plant a tree or trees to match, say, an existing streetscape. Provided that they first obtain Council approval for the proposed planting there should be no need to impose unnecessary impediments to such altruistic and community-minded efforts.

5. I would like to see the third page of the “Application for Tree Works” form improved to provide better guidance to the council staff who will use it and a better record of the decision. The third page records the decision process.

- There should be a panel that sets out the definition of significant tree in a tick box form so that the arborist can quickly tick off whether any of the factors are relevant to the tree in question.
- A panel should be inserted where any parties consulted can be recorded and their views noted.
- There should be a space beside the names of the Recommender and Approver to record their qualifications. Note: the policy defines a qualified arborist and requires that certain determinations and assessments be undertaken by an arborist.

Parks staff agree that changes should be made to the decision sheet but take the view that this page is not part of the Policy and can be changed at any time in the future. I believe it would give the community greater comfort about how the new policy will be applied if these suggested changes to the decision sheet were to be endorsed by Council and made at the same time as the wording of the Policy is finalised.

Officer Comment: *All points incorporated into the Tree Policy. The Application for Tree Works has been reviewed and updated alongside the Policy.*

Hi there,

I know the consultation finished at 5pm Sunday, apologies hope you can include this feedback in the responses:

There are a couple of things which aren't covered in the tree policy, and which have caused issues in the past. If these could be added to the policy, there would be significantly less angst.

Please define what is required to add a tree to the QLDC database. There are many trees which are on QLDC land but which aren't on the GIS. My particular example is Robertson St in Frankton, but I'm sure there are others. If a tree is of a certain size, and isn't on the database, should it be added? **Officer Comment:** *Continually adding new and existing trees to the database as part of the Maintenance Programme.*

Please also clarify that if a tree has been planted without a licence to occupy (like many of the trees on council land in Frankton) what the process is. Should it be generally left, unless there is a good reason to remove, or removed unless there is a good reason to keep? Its currently not clear in the policy.

Officer Comment: *All new plantings are required to go through the application process. Historic plantings can be individually reviewed upon request, but focus is to retain existing trees.*

Please include something relating to trimming trees. There are many trees outside of people's houses, and there currently isn't a mechanism to trim these at all. This may be the policy, there is a whole section about tree removal process, but the tree maintenance section is weak, essentially saying that QLDC will put it on the maintenance programme. Trying to engage with the arborist previously has resulted in silence. It feels like there are many situations where the removal of trees is permitted, but reduction in height or volume as a compromise and leaving the tree is not covered within the policy. The tree works application form also needs to better match the tree policy. **Officer Comment:** *The Tree Policy supports industry best pruning practices and QLDC have a three-year Maintenance Programme, with the aim to assess every street tree and reserve in the District. The Application for Tree Works has been reviewed and updated to reflect the changes of the Tree Policy.*

The tree replacement policy needs a little more finesse. Surely we should be explicit about suitable native trees, in preference to canopy cover. I guess this goes wider than the tree policy, but perhaps a statement on the intent of the tree replacement is required. Its pretty poor that the tree policy doesn't contain the word native, and surely its QLDCs aim to promote native trees over exotics. Perhaps it isn't, but just a sentence on preferences given to native trees or similar. **Officer Comment:** *Policy 1.2 updated.*

Thanks