

Council Policy

Title:	Management of Tree Protection on Private Property Policy 2018
Version:	Draft
Owner:	General Manager Operations and Capital
Adopted by:	Darebin City Council
Date adopted:	TBD
Scheduled review:	July 2023
Document reference no:	A4628887

1. Policy intent

Protecting and expanding the tree canopy of the entire municipality is an integral part of providing neighbourhood amenity, natural beauty and a sustainable environment and identified in Goal 1.3 “expand and improve our network of open and green spaces, parks and natural environments”.

The Darebin Planning Scheme Vegetation Protection Overlays (VPOs), Environmental Significance Overlays (ESOs) and Draft Local Law assist Council to protect and expand the tree canopy of the entire municipality.

This Policy is intended to provide guidance with regard to assessing Local Law permits for Protected Trees on private property in accordance with the Tree Protection Local Law 2018 and ensure suitable replacement planting is provided for tree canopy removed. A person, without a permit, must not destroy, damage or remove or allow to be destroyed, damaged or removed protected or significant trees on any private property.

A permit is not required:

- Where pruning is carried out by a qualified Arborist in accordance with the relevant Australian Standard (4373:2007) who certifies their work, including photographs before and after work; or
- In an emergency, any part of a tree that is an immediate threat to life and or property may be removed.

A permit would not be required for most fruit trees such as apples and lemons, due to their smaller size. This will allow residents to prune most fruit trees as required without permit.

2. Purpose/Objective

The purpose of this Policy is to protect and enhance the urban character, by regulating tree removal and pruning of trees on private property. The replacement planting will be achieved using species that are suitable to the local vegetation theme of the area and site constraints.

Protected trees can be very long-lived and provide a sense of character and identity to an area. They also contribute significantly to modifying the impacts of living in an urban environment, including reducing runoff into drains, reducing air temperatures, capturing dust particles and pollutants in the canopy, increasing property values, providing natural protection from the sun, contributing to psychological well-being and providing habitat for local fauna.

An increasing density of urban development means that the number of large trees on private land is decreasing, therefore the health and sustainability of these trees is becoming increasingly important.

Decisions made in respect to tree removal permits need to consider the property owner’s needs, any risk or damage to persons or property and the impact of the tree removal on the environment and local amenity.

Objectives:

- To guide the decision making for protected tree removal permits for protected trees on private property;
- To guide the selection of replacement planting on private property where tree removal permits are granted, in order to enhance local amenity and urban character; and
- To encourage all protected tree pruning works to comply with the appropriate Australian Standards.

3. Scope

This Policy is limited in its application to trees that are protected under the Tree Protection Local Law 2018

A protected tree is a tree with a single, or combined trunk circumference greater than 125 centimetres measured at 1.5 metres above ground level and having a height greater than 8m, excluding species which are declared Noxious Weeds or an immediate hazard.

This Policy does not apply to exemptions and determinations made by the Responsible Authority regarding trees protected by the Darebin Planning Scheme. This includes, but is not limited to:

- Heritage Overlays;
- Environmental Significant Overlays;
- Native vegetation (Clause 52.17 Planning Scheme);
- Vegetation Protection Overlays;
- Vegetation on land owned or managed by Council

4. Roles & Responsibilities

Role	Responsibility
Policy Development	Manager Parks and Open Space, Manager City Safety and Compliance, Coordinator Tree Management
Policy Implementation	Coordinator Tree Management, Planning Arborist
Policy Evaluation	Manager Parks and Open Space, Manager City Safety and Compliance
Policy Review	Manager Parks and Open Space, Manager City Safety and Compliance and Coordinator Tree Management
Decision Making – Tree pruning and removal permits	As per section 7.5
Tree replacement	As per section 8

5. Monitoring, evaluation & review

The effectiveness of the *Management of Tree Protection on Private Property Policy* will be reviewed by the Parks and Open Space and City Safety and Compliance Departments and will consider input from community stakeholders. Information on applications and decisions will be maintained in Council's record management system.

6. Policy statement

Darebin City Council has committed to providing high-quality living environments for residents, ratepayers and visitors. Darebin's vegetation makes an important contribution to local amenity, sense of place, neighbourhood character, landscape values and cultural heritage. It enhances local climatic conditions by providing shade, wind protection and relief from the urban heat island effect. In some locations, vegetation also contributes to native fauna habitat and local biodiversity.

Darebin City Council is committed to protecting and enhancing vegetation cover because it is regarded as integral to municipal identity and underlying land values. Recent research has confirmed that the tree canopy is gradually being eroded. Large trees are being lost due to land development, risk aversion, infrastructure and property maintenance, climate variability, natural attrition, pests and disease.

A proactive approach to protecting and enhancing vegetation cover is required in order to maintain the high levels of amenity and distinctive character of Darebin's suburbs.

Council applies a range of regulatory and operational measures aimed at protecting vegetation on both private and public land. In relation to private land, two legal instruments facilitate vegetation protection and replacement:

- *Tree Protection Local Law 2018*
- *Darebin Planning Scheme* (under provisions listed in Section 3 of this policy and through the use of planning permit conditions).

7. Tree removal permit

A Permit is required to remove a tree described in the Tree Protection Local Law 2018. Applications are made in writing or online using a standard template and must be adequately supported with the nominated information.

Tree removal applications need to include a plan for planting suitable replacement canopy tree or trees (information in section 8). Approved replacement trees may be subject to inspection by Council Officers after planting and failure to plant or removal shall be considered a breach of permit.

7.1 Assessment

The preliminary assessment includes inspection of the tree's health and structure to determine if the tree is dead or structurally unstable. Permits are granted to remove dead or hazardous trees. Refer to Attachment A, *Preliminary Assessment*.

For trees not identified as structurally unstable or dead, a full tree removal assessment is undertaken. Refer to Attachment B, *Tree Removal Assessment*.

A **Quantified Tree Risk Assessment (QTRA)** is only completed to assess a tree's risk where it is identified on the application form that the tree removal is required as it poses a danger to people or surrounding infrastructure. When a tree is assessed using the QTRA and an unacceptable risk of harm is identified, a Permit to remove the tree will be issued.

For a tree-failure hazard to exist there must be potential for failure of the tree and potential for injury or damage to result. The assessment will consider the likelihood of a combination of tree failure, harm to people and property and the likely severity of the harm. Refer to Attachment C.

Other considerations:

Officers assessing applications are to take into consideration all relevant matters, and specifically, any evidence supplied in the form of:

- a) A report by a qualified Arborist where the report assesses the tree as posing an unacceptable risk;
- b) A report by a Structural Engineer where the report assesses that the tree is the primary cause of damage to the structure; and
- c) A landscaping proposal that includes suitable canopy tree replacements, for trees proposed to be removed.

When considering a) and b) above the report MUST contain verifiable information on which the conclusions are drawn.

7.2 Pruning trees on private property

Pruning should be carried out by a qualified Arborist in accordance with the relevant Australian standard (the current standard is Australian Standard 4373:2007 Pruning of Amenity Trees). This standard encourages pruning practices and procedures that reduce the potential for a tree hazard developing, branch failure, fungal infection or premature tree death. Tree Protection Local Law 2018 states that a permit is required for a tree to be cut, trimmed, lopped or pruned. Applications should be in the standard form and be adequately supported with relevant information.

A permit is not required:

- Where pruning is carried out by a qualified arborist in accordance with the relevant Australian Standard (4373:2007 Pruning of Amenity Trees) who certifies their work, including photographs before and after work (e.g. regular maintenance or minor pruning); or
- In an emergency, any part of a tree that is an immediate threat to life and or property may be removed.

A permit would not be required for most fruit trees such as apples and lemons, due to their smaller size. Most fruit trees would not be protected trees. This will allow residents to prune most fruit trees as required without permit.

Lopping, topping or flush cutting are not promoted practices as the indiscriminate removal of trunks or leaders at intermodal points in the crown may lead to the development of poorly attached epicormic growth. This does not apply to fruit trees as they require reduction pruning to enable fruit harvest. Fruit trees are not generally protected trees due to their smaller size.

7.3 Tree pruning / removal in emergency circumstances

In an emergency, that part of a tree that is an immediate threat to life and or property may be removed without a permit.

7.4 Branches overhanging properties

Where a permit is required to cut, trim, lop or prune limbs that overhang a property boundary, the owner of the tree (if not the applicant) will be provided with a copy of any permit issued.

It is noted that a permit does not change any common law rights and obligations relating to overhanging branches.

7.5 Decision making for Tree Removal and Pruning Permits

Permit assessments are undertaken by an authorised officer with arboriculture qualifications in accordance with section 7.1, 7.2, 7.3 and 7.4. The Officer will inform the applicant of the decision made by Council.

If an applicant is dissatisfied with the decision in relation to the application, the applicant may apply in writing for an internal review of the decision, as per Greenstreets Streetscape Strategy guidelines.

7.6 Tree Assessment Definitions

The tree assessment definitions are provided in Attachment D and section 10 of this Policy.

8. Replacement Planting

In order to enhance the overall tree canopy cover, Council aims to:

- Achieve a net increase in the number of canopy trees on both private and public land; and
- Encourage the planting of canopy trees of sufficient scale to contribute to the diversity of the canopy.

Preferred tree planting ratios and scale

Application type	Preferred number of canopy trees	Preferred scale of trees
1. Tree removal under Tree Protection Local Law 2018	A minimum of one canopy tree for every canopy tree removed.	Replace canopy trees with new trees expected to mature to achieve the heights specified below.

8.1 Tree Replacement Planting Height

- Where the existing tree is 20 metres or less, the existing tree will be replaced with a tree capable of achieving a minimum of 75% of the existing tree's size; or
- Where the existing tree is 21 metres or greater, the existing tree will be replaced with one tree capable of achieving a minimum of 75% of the existing tree's size, or with two trees, one of which is capable of reaching a minimum height of 15 metres at maturity.

Applications are assessed and consideration will be given to site constraints and available tree replacement planting zones (refer to information in section 8.2 and 8.3). Alternative canopy heights may be approved in exceptional circumstances, for example where there are existing medium to large trees (greater than eight metres) on the site or there is insufficient set back to accommodate the tree root zone of a larger canopy tree.

Replacement trees that have been approved by Council's Planning Arborist may be inspected. Failure to plant, or removal, of the approved replacement tree will be considered a breach of permit.

8.2 Site constraints

Canopy trees should be included on all Replacement Planting Plans unless evidence is provided by a suitably qualified professional to the satisfaction of Council, that:

- There is insufficient soil volume to support the long-term viability of a canopy tree suitable to the locality; and
- The planting of a tree in a particular location would likely cause damage to property or infrastructure services, a substantial nuisance to adjoining property owners, or a traffic hazard that cannot be avoided or mitigated without unreasonable expense.

- If site constraints preclude the planting of replacement trees applicants will be required to pay for the planting of an equivalent number of trees as determined in section 8.1 in public open space at a location determined by Council. The fee will be the equivalent of the tree replacement fee charged for the replacement of street trees.

8.3 Tree Planting Zone

New canopy trees need to be carefully located and managed in order to promote tree growth and vitality; and to reduce the likelihood of long-term damage to buildings and infrastructure.

In order to ensure optimal conditions a Tree Planting Zone must be identified around each proposed new canopy tree and around canopy trees that are to be retained. The size of the Tree Planting Zone is based on the tree canopy spread (width) at maturity.

Tree Planting Zones should be sited and designed in accordance with the following guidelines:

- Trees should be planted in locations where they will have access to sunlight and water;
- Trees should be centred within their Tree Protection Zones in order to encourage even growth;
- Trees should be planted outside of easements and in accordance with service authority guidelines (e.g. near sewer and water mains and power lines);
- overlapping of Tree Protection Zones should be minimised;
- Tree Protection Zones should be clear of buildings, hard surfaces and clothes lines. Where buildings or hard surfaces do encroach, applicants must demonstrate how healthy tree growth will be promoted and structural damage avoided;
- Paved surfaces should be constructed of water-permeable materials;
- mulching to a minimum depth of 50mm should be installed throughout the majority of Tree Protection Zones. Mulched areas may include understorey planting; and
- Where tank water is available, the installation of automatic drip irrigation is encouraged.

8.4 Species selection

The structure and mass of a tree’s canopy is one of the most defining aspects of the character that it contributes to an area.

Species should be selected that are suitable for the location, taking into account all services and infrastructure above and below ground, to allow for successful tree growth. Local character must also be taken into account.

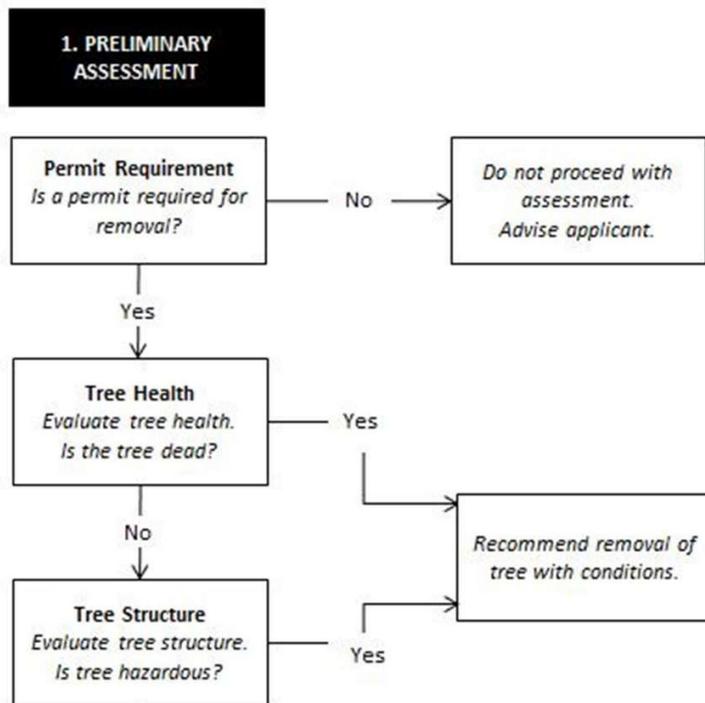
Replacement trees are to be approved by Darebin Councils’ authorised Arboricultural Officer.

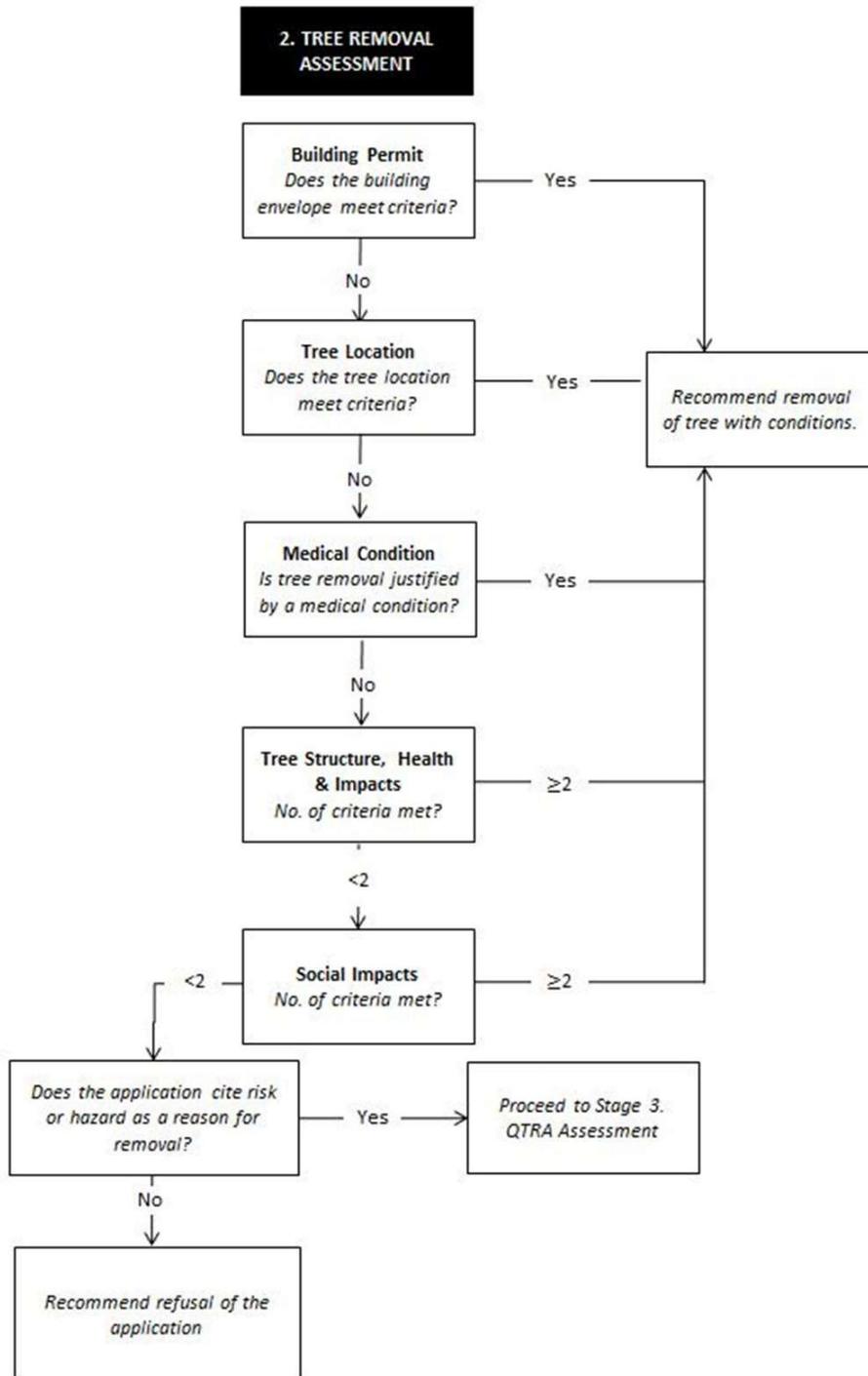
9. Related documents

Legal	Darebin City Council, Tree Protection Local Law 2018
Strategies	Urban Forest Strategy 2013-2025 Greenstreets Streetscape Strategy 2012-2020
Guidelines	Customer Service Charter

10. Definitions & Abbreviations

Term	Meaning
Protected Tree	<p>A Protected Tree is a tree with a single trunk circumference or combined trunk circumference greater than 125 centimetres measured at 1.5 metres above ground level and greater than 8m in height, but excluding species which are declared Noxious Weeds.</p> <p>Protected trees are generally of medium to large size, with an equivalent trunk diameter of 400mm, measured at 1.5 metres above ground level. Eucalypts, Oaks and other trees are examples of a medium to large tree. Fruit trees are not generally protected trees due to their smaller size.</p>
Tree	<p>Any perennial plant having one or more permanent, woody, self-supporting trunks and with branches forming a crown, and includes all parts of the plant whether above or below ground.</p>
Canopy tree	<p>A tree which has, or at maturity is likely to have, sufficient height and canopy characteristics to make a positive contribution to local amenity, sense of place, microclimate and/or biodiversity. Minimum 8 x 4 metres.</p>
Indigenous tree	<p>Native species that were present in the original vegetation communities of the suburb, excluding cultivars and varieties thereof.</p>
Minor Pruning	<p>Minor pruning or pruning for regular maintenance is carried out in accordance with Australian Standard (4373:2007 Pruning of Amenity Trees) by a suitably qualified arborist and does not result in the damage or destruction of a protected tree on private property.</p> <p>A permit would not be required for most fruit trees such as apples and lemons, due to their smaller size.</p>
Native tree	<p>Species that are endemic to Australia, may include indigenous (including cultivars and varieties of indigenous species).</p>
Exotic tree	<p>Species whose natural habitat is exclusively outside of Australia.</p>
Weed species	<p>Species identified as:</p> <ul style="list-style-type: none"> (a) A State prohibited weed; (b) A regionally prohibited weed; (c) A regionally controlled weed; or (d) A restricted weed; <p>Under State catchment and land protection regulations.</p>





Additional Assessment Criteria for Tree Removal Permit Applications

1 Building Permits

Where a building permit has been issued under the *Building Control Act 1993* and the permitted building(s) and/or construction works:

- Are located in such a position that the subject tree is within the envelope of the permitted buildings or works;
- Encroach on the tree protection zone of an existing tree by more than 40%; or
- Encroach on the structural root zone of an existing tree.

A permit will be issued to remove the affected trees with Conditions, which include a requirement for replacement tree/s.

Where a Building Permit has been issued under the *Building Control Act 1993* and the above criteria do not apply the application must be assessed in accordance with Table 1.

Table 1. Assessment method for tree removal

Works proposed	Assessment	Recommendation
New dwelling, or alterations and additions to existing dwellings including extensions to the dwelling or garages built as part of the house.	The applicant can demonstrate to Council's satisfaction that: <ul style="list-style-type: none"> • The proposed works cannot be redesigned; • Appropriate arboricultural techniques as detailed in the submission of an arborist report cannot be employed in order to retain the tree; and • Compensatory replacement planting can be established on site. 	Approval Subject to a condition requiring replacement tree/s.
	The applicant cannot satisfy the above requirement.	Refusal
Tennis courts, patios, decks, and carports.	The proposed works cannot incorporate retention of the subject tree.	Refusal Where Building Permit not granted.

2 Tree Location

A Permit will be issued where a report from a licensed and/or qualified person in their field provides evidence that the tree is causing structural damage to a building, services or infrastructure or is a risk to people or property, which can only be overcome by implementing a remedy that is unreasonable or greatly disproportionate to the value of the tree or the risk posed by the tree (assessed by QTRA).

Trees located in close proximity to dwellings, garages, intersections and crossovers must be assessed in accordance with the criteria outlined in Table 2. The recommendation to the Coordinator Investigations should be consistent with the Table, unless subsequent steps in the procedure warrant a different recommendation.

Table 2

Tree Location	Recommendation
Within two metres of a dwelling	Removal recommended if any part of the tree trunk is within two metres of an existing dwelling.
Within one metre of a garage or carport	Removal recommended if the tree will outgrow the location and/or is causing damage to an existing garage or carport.
Crossover	Removal recommended if a crossover is approved within the structural root zone of the tree, unless an arborist report, accompanied by non-invasive root map investigation can be provided to demonstrate that the tree can be successfully retained.

Conditions will include a requirement for replacement tree/s.

3 Medical condition

Where an application for tree removal:

- Where a medical certificate is provided from a specialist in the relevant field to certify that a specific tree is causing a specific allergenic problem for a resident that significantly diminishes the quality of life of that person and there is no other way of managing the problem.

A permit would be issued for removal under delegated authority, Conditions will include a requirement for replacement tree/s.

4 Tree health, structure and impacts

A tree removal permit will be granted where a referral report by Council's Environmental Health, Assets, Traffic or other relevant Council Employee at Coordinator or Management level, or higher, confirms the tree has a detrimental impact on the surrounding environment/public health.

If any two of the tree health, structure and impacts criteria nominated below apply a recommendation for tree removal should be made to the authorised Arborist Officer by the Arborist assessing the tree. Conditions for replacement tree/s would be included.

If none of the criteria apply, a recommendation for refusal of the application should be made to the authorised Arborist Officer.

Criteria

Tree health, structure and impacts criteria:

- The health of the tree is classified as poor (definition included in **Attachment D**);
- The structure of the tree is classified as poor (definition included in **Attachment D**);
- The sustainable life expectancy of the tree is assessed at less than 5 years.

5 Social considerations

If any two of the 'Social considerations' criteria apply a recommendation for tree removal should be made to the Manager Parks and Open Space subject to conditions. Conditions should include a requirement for replacement tree/s.

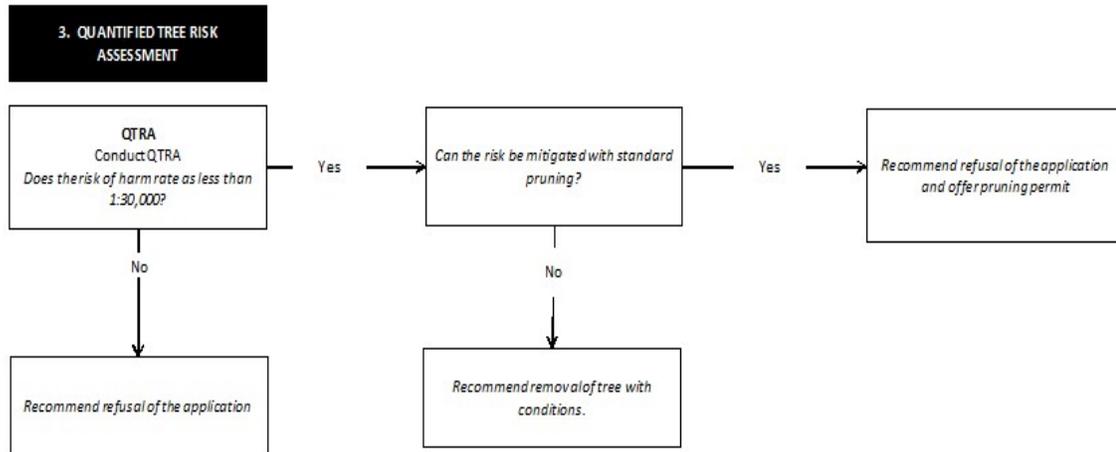
If less than two of following criteria apply, a recommendation for refusal of the application should be made.

Criteria

Social considerations criteria:

- The amenity or character value of the tree is classified as moderate or low (definition included in **Attachment D**);
- There are at least two other trees on the property that:
 - require Council permission to remove;
 - are classified as having an amenity or character value of moderate or high;
 - have a sustainable life expectancy of more than 10 years;
 - are not subject to a current removal permit application or existing permit;
- There are written letters supporting tree removal from property owners/tenants and adjacent to and opposite the property (at least four individual properties);
- demonstrate financial hardship and inability to undertake routine maintenance - the applicant has no source of income to pay for the maintenance and is receiving Centrelink benefits.

Tree Removal Assessment



Quantified Risk Assessment

Tree safety management involves limiting the risk of harm from tree failure while maintaining the benefits conferred by trees.

The Quantified Tree Risk Assessment (QTRA) system quantifies the risk of significant harm from tree failure in a way that enables tree managers to balance safety with tree values and operate to predetermine limits of tolerable or acceptable risk. Council’s Arborist’s have a licence to undertake a QTRA.

By quantifying the risk from tree failure as a probability, Quantified Tree Risk Assessment (QTRA) enables a tree owner or manager to manage the risk in accordance with widely applied and internationally recognised levels of risk tolerance. It provides a risk level against which mitigation strategies can be balanced to determine appropriate actions

QTRA advisory risk thresholds

Threshold	Description	Action
1/1- 1/9,999	Unacceptable (where imposed on others) Risks will not ordinarily be tolerated	<ul style="list-style-type: none"> Control the risk Review the risk
	Tolerable (by agreement) Risks may be tolerated if those exposed to the risk accept it, or the tree has exceptional value	<ul style="list-style-type: none"> Control the risk unless there is broad stakeholder agreement to tolerate it, or the tree has exceptional value Review the risk
1/10,000 – 1/999,999	Tolerable (where imposed on others) Risks are tolerable if as low as reasonably practical (ALARP)	<ul style="list-style-type: none"> Assess costs and benefits of risk control Control the risk only where a significant benefit might be achieved at reasonable cost Review the cost
1/1,000000 or less risk	Broadly Acceptable Risk is already ALARP	<ul style="list-style-type: none"> No action currently required Review the risk

ATTACHMENT D

Tree assessment definitions

Origin

(I) Indigenous

The tree is endemic to the local area and has been naturally occurring since recordings of flora commenced.

(V) Victorian

The tree is endemic to the state of Victoria and has been naturally occurring since recordings of flora commenced.

(A) Australian

The tree is endemic to mainland Australia and has been naturally occurring since recordings of flora commenced.

(E) Exotic

The tree is not endemic to any part of mainland Australia.

Health

Tree health is based on vigour and vitality. In assessing health, observations are made of the following:

- foliage characteristics
- extension growth
- wound wood development
- extent of predation or disease

In many instances correct application of arboricultural management practices can revitalise a tree and extend its ability to provide a value to the community.

(G) Good

- Tree displays 71-100% live canopy mass
- Foliage exhibits near optimal foliage characteristics in size, colour and density
- Tree may have low levels of tip dieback
- Tree may exhibit low levels of pest/pathogen infestation that is not expected to have a significant impact on the long term health of the tree

(F) Fair

- Tree displays 51-70% live canopy mass
- Foliage may be stunted or discoloured
- Tree exhibits less than optimal extension growth
- Tree has moderate pest/pathogen infestation which may be retarding growth and impacting on health levels, it is expected that the tree can recover with or without intervention

(P) Poor

- Tree displays <50% live canopy mass
- Tree exhibits low levels of extension growth
- Tree has extensive pest/pathogen infestation and is not expected to recover from such infestation even with intervention
- Tree may be senescent

(D) Dead

- Tree has no live vascular tissue

Structure

Structure refers to the physical integrity of the tree.

Natural species form may not constitute poor structure.

Pest/pathogen damage is not directly a structural issue, however may contribute to structural issues/faults.

In assessing structure, observations are made of the following:

- Branch attachment and union formation
- Damage to trunk/roots/unions/branches
- Trunk/scaffold/tertiary branch taper

In many instances correct application of arboricultural management practices can reduce likelihood of failure to an acceptable level and extend a tree's ability to provide a value to the community.

(G) Good

- Tree has good branch attachment and well-formed unions
- Tree has good trunk and scaffold branch taper
- Tree may have poor tertiary branch taper
- Tree may exhibit structural defects on tertiary branches and attachments
- Complete tree failure or major structural failure under normal environmental conditions is unlikely
- Remedial pruning works may improve the structural rating of the tree

(F) Fair

- Tree may have poor scaffold branch/stem taper
- Tree may have poor tertiary branch taper
- Tree may have minor structural root damage/severance
- Tree may exhibit structural defects to the trunk or scaffold branches
- Majority of structural defects may be managed through current recognised arboricultural practices

(P) Poor

- Tree may exhibit major structural defects to trunk and/or scaffold branch attachments
- and/or roots

(H) Hazardous

- Complete or major structural failure is imminent

Amenity Value

The visual contribution the tree makes to the neighbourhood character.

(L) Low

- Tree has poor health and/or
- Tree provides little visual contribution to the neighbourhood character

(M) Moderate

- Tree has fair/good/excellent health and/or
- Tree is easily viewed from the street

(H) High

- Tree has fair/good/excellent health
- Tree is highly visible from the street
- Tree is visible from other streets in the area

(N/A) Not Applicable**Useful Life Expectancy**

The period of time that the tree is expected to maintain a positive contribution to the neighbourhood character.

20 yrs. +

Tree is likely a semi-mature or mature tree that is in good health and structure and is expected to maintain current levels of amenity for a minimum of 20 years.

10-19 yrs.

Tree is likely a mature tree that is in good health and/or structure and is expected to maintain current levels of amenity for a minimum of 10 years.

4-9 yrs.

Tree is likely a mature tree that is in fair health and/or structure and is likely declining. It is expected that the tree is not likely to maintain current levels of amenity for more than 9 years.

0-3 yrs

Tree is likely a mature tree that is in poor health and/or structure and is likely declining. It is expected that the tree is not likely to maintain current levels of amenity for more than 3 years.

Retention Value

The value of the tree when considering the tree as a whole. The health, structure, amenity value and life expectancy are considered when determining this factor. The tree location on the subject site or a development proposal is not a consideration for determining retention value.

(H) High

The tree is generally in good health and structure, provides high levels of amenity and is likely to do so for more than 20 years. Tree may have historic or cultural significance.

(M) Medium

The tree is generally in fair to good health and structure, provides high levels of amenity and is likely to do so for up to 20 years.

(L) Low

The tree is generally in fair health and structure, provides low levels of amenity and may do so for up to 10 years. The tree may be juvenile or otherwise small and easily replaced by advanced plantings or plantings that will provide similar amenity value in a reasonable timeframe.

(N) None

The tree has no features that would promote retention for any reason, such as a dead tree or one that provides no amenity value.

(O) Trees on other property

Any tree located outside the subject site is to be retained and protected.