



## Statement for submission as part of ECF 'Let's Talk Armada Way' consultation

November 24<sup>th</sup>, 2023

### Nature and Greenery

The information provided in this section is too lengthy and may appear overwhelming to many respondents. It gives the impression of a 'hard sell' which seems unusual for a consultation of this nature.

The details on the height of the proposed trees are misleading, stating that all new trees will be 3.5m-8m tall, whereas only one tree is stated to be 7m+.

The information on Plymouth City Council's plan to plant 147 trees (what we believe to be a Miyawaki forest) on the grass outside the Crown Plaza on the Hoe should not have been included in this consultation. We are surprised that ECF have allowed the inclusion of this element, given that it is not related to the Armada Way development (i.e. it is not within the red line boundary), has not yet been approved and might never happen. This element is an irrelevant distraction from the point of the survey, and could be considered greenwashing. This would be in the Conservation Area, and this area is on the Historic England list of registered Parks and Gardens. We do not believe that planting a large, dense mass of trees here is appropriate for the Hoe. It is not, 'Right tree, right place'. Plymouth City Council have recently cleared an urban 'mini-forest' at the top of Armada Way, stating that it was attracting 'anti-social behaviour'. Why would this be any different?

**We request that ECF forward the rationale for allowing the inclusion of this potential (as yet unconfirmed) proposal, that is not part of the Armada Way development plan.**

We have concerns around the given responses that can be selected for this survey question, particularly: '*That as many existing trees as possible will remain where they are*'. The definition of what is 'possible' is not given, and it is stated within the consultation that the

plan is not possible without the translocation of 6 trees. As such, this perhaps should be interpreted as *'retain the existing trees apart from the 6 that it is not possible to retain'*. This survey question should include an additional selectable response: *'That all existing trees remain in situ'*. Leaving this option out essentially creates a bias and we believe this is a flaw in the survey design.

**We request that ECF provide the rationale for leaving out an option to select *'That all existing trees are retained'* and ECF's opinion on whether this creates a bias in the survey.**

The proposal to remove more trees is particularly disappointing considering the very public upset and anger caused by the council's decision to fell so many healthy, mature trees in Armada Way in March of this year. In doing this, Plymouth City Council ignored the results of their own consultation which showed that *'an overwhelming majority of respondents were against the scheme in any form'*.

We do not believe convincing reasons have been given for the removal of a further 6 trees. It appears from the information provided that the reasons for removing the trees are largely design elements which could be modified.

We have repeatedly requested the detailed Sustainable Urban Drainage (SuDs) plan as this was one of the reasons given for the removal of these trees. Despite our requests, we have not received this information and therefore cannot be assured that this is a convincing reason for removal of further mature trees.

In January of this year, Plymouth City Council ruled out translocating any trees due to both the significant costs and the very high risk of them not surviving. Former Councillor Dreaan stated in a full council meeting *"All advice I have received, including from tree experts, the city council's own Natural Infrastructure team and the Woodland Trust was that it was not advisable, they will die"*. Because of the definitive ruling out of any potential to translocate trees previously, we would have expected to see the detailed rationale for this complete change of opinion. We note that Plymouth City Council announced at around the same time that *"Some 25 existing trees were identified as potentially possible for translocation, but this is now not being taken forward as it is not regarded as good arboriculture practice and the relocated trees are unlikely to survive the move"*.

The condition of the trees has not been cited as reason to remove any of these 6 trees and we presume that Plymouth City Council consider them to be in a good condition (as evidenced within the previous Arboricultural Method Statement) otherwise they would not be proposing translocation.

Plymouth city centre has very low canopy cover - approximately 5% - compared with an average in urban wards of 17.3%. The Woodland Trust have previously recommended a minimum of 20%. Established trees have a much greater chance of contributing to an area's canopy cover than newly planted trees (which are vulnerable and have lower survivability), and as such they should be considered of utmost importance. Moving these 6 trees from an area of such low canopy cover to an area with approximately 30% cover does not make good sense.

These existing mature trees are already providing the social, health and environmental benefits that cannot be provided by young trees for decades. Very few of the proposed trees will grow to be significant in size. Only 2 might reach the size of some of the trees felled in March.

The proposed design has only 20% 'green coverage' – it is not very clear what this means but it is even less than the previous design. Green spaces are important for people to escape the hustle and bustle and the mental health benefits are well documented. The design remains heavily characterised by the wide expanses of unshaded paved surfaces. Armada Way was, until recently, considered a Green Corridor by Plymouth City Council. This design will not bring back Green Corridor status. The lack of information on planting other than trees is disappointing. Armada Way is a very wide area and could support the planting of more significant tree varieties and could be made much greener and nature-rich.

We were informed by Plymouth City Council in February that a budget for long term maintenance of the scheme would be published in the summer. The design is very similar to the last one, so it is disappointing that this still has not happened. It is our understanding that S106 money cannot be used for long term maintenance.

The council leader has made repeated promises to retain all the trees, even using it as an election pledge, but has now reneged on this pledge. In June, Cllr Evans, expressed an opinion that "protesters", by which we assume he means people who are associated with STRAW, cannot understand words longer than 1 syllable because we were sceptical of his claims that all the trees would actually be retained long term. These comments were insulting and it now appears that our concerns were valid.

The consultation material states that the report of the consultation will be complete by December 19<sup>th</sup> and that in early 2024 the council will publish the new design. It took 4 months for the council to finalise the design prior to the consultation. We question whether adequate time has been allocated for any modifications to the design based on the findings of the consultation.

Another concern is that the survey relies heavily on qualitative data. As demonstrated with the February consultation, comments are not represented in graphs. The report from February distilled all of the comments about retaining more trees into 1 sentence with no indication of how many people had included this in their response. A recent FOI request has revealed that Plymouth City Council didn't actually count how many people expressed a desire for more trees to be kept. We have been informed that all responses from the previous consultations will be relied upon but this figure appears not to have been calculated. Given the significant changes to the scheme, the lack of information provided at the time on the Armada Way scheme and the length of time since the 2018 'consultation', we do not believe it is appropriate to rely in any way on the results from this consultation. **We request that ECF provides information on how qualitative information (that respondents may submit in free text format) will be analysed and reported upon.**

We recently requested a face-to-face meeting with ECF and a representative of PCC. We anticipated that the meeting would have been attended by representatives from STRAW, PTP

and other stakeholders, such as Environment Plymouth. We were told by a member of the ECF team *“we acknowledge your request, however, but this is not something we have arranged with any other groups and therefore it would not be equitable to offer it to STRAW”*. Following this refusal, we have learned that at least one meeting with ECF, representatives of the PCC design team and a stakeholder group was held and that this meeting was arranged by ECF.

**We request that ECF provide the reasoning that stakeholder groups have not been consulted equally, given that other groups have met with the scheme’s design team and Straw’s request for this was refused.**

STRAW Plymouth